SAFEGUARDING ADULTS POLICY AND PROCEDURE

PRIMUS PLUS HEALTHCARE

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1.0 PURPOSE

The purpose of this Safeguarding Adults Policy and Procedure is to establish a robust and comprehensive framework for safeguarding adults at risk, particularly those with learning disabilities, mental health needs, and autism spectrum conditions, within the Supported Living without Personal Care services provided by Primus Plus Healthcare. This policy aims to protect all Service Users from any form of abuse, neglect, exploitation, or harm that may arise during their time in supported living environments, while ensuring that their rights, dignity, and autonomy are respected.

The policy is designed to outline Primus Plus Healthcare's commitment to preventing harm and promoting the well-being of vulnerable adults. It seeks to ensure that Primus Plus Healthcare meets all relevant legal, ethical, and regulatory standards, including compliance with the Care Act 2014, Health and Social Care Act 2008, CQC Regulations, and other national and local guidelines for safeguarding adults. The policy applies specifically to supported living services where personal care is not provided, and focuses on safeguarding those who may be at risk due to their vulnerability or living situation.

This policy aims to:

1.1 Prevent Abuse

The primary objective of this policy is to prevent abuse from occurring by proactively identifying and addressing potential risks in the supported living environment.

- Early Risk Identification: Risk assessments will be conducted regularly for all Service Users to identify vulnerabilities that may put them at risk of harm, neglect, or exploitation.
- Preventative Measures: Primus Plus Healthcare will implement preventative actions, including staff training, clear communication of safeguarding expectations, and robust risk management strategies.
- Supportive Environment: Service Users will be encouraged to actively participate in decisions regarding their care and well-being, ensuring that they feel empowered to voice concerns and engage in safeguarding practices.

1.2 Promote Awareness

This policy aims to increase awareness of safeguarding among all stakeholders, ensuring that staff, Service Users, families, and external partners are equipped to recognize signs of abuse and respond appropriately.

- Training and Education: All staff, volunteers, and contractors will receive regular, comprehensive safeguarding training to ensure they understand how to identify, respond to, and report concerns of abuse, neglect, and exploitation. The training will be tailored to meet the specific needs of Service Users with learning disabilities, mental health needs, and autism spectrum conditions.
- Service User Engagement: Service Users will be informed of their rights and given accessible information about how to recognize and report abuse. This includes the provision of materials in formats that are easily understandable, ensuring Service Users, especially those with communication challenges, are aware of safeguarding procedures.
- Collaboration with Families and Advocates: Families, carers, and independent advocates will be included in the safeguarding process, supporting Service Users in understanding and exercising their safeguarding rights.

1.3 Respond to Abuse

The policy ensures that clear, effective, and sensitive procedures are in place to respond to safeguarding concerns, complaints, or allegations of abuse, neglect, or exploitation.

- Reporting Mechanisms: Primus Plus Healthcare will establish transparent, easy-to-follow reporting procedures that allow staff, Service Users, and external parties to raise concerns. These procedures will ensure that all concerns are handled promptly and impartially.
- Investigation Process: Once a concern has been raised, it will be investigated in accordance with legal and ethical guidelines. Investigations will be impartial, and all individuals involved will be treated fairly and respectfully, ensuring that the process is transparent and accountable.
- Legal and Regulatory Compliance: All responses to safeguarding concerns will be conducted in line with relevant legislation, including the Care Act 2014, Health and Social Care Act 2008, and CQC Regulations, ensuring that proper safeguarding measures are taken in a legally compliant manner.

1.4 Ensure Compliance

Primus Plus Healthcare is committed to ensuring that its safeguarding practices comply with national and local safeguarding regulations, ensuring the organization meets the required legal and ethical standards.

- CQC Regulation 13: This policy ensures compliance with CQC Regulation 13, which mandates the protection of Service Users from abuse and improper treatment. All procedures outlined in this policy align with the regulatory expectations for safeguarding and Service User protection.
- Safeguarding Legislation: The policy is designed to meet the requirements of all relevant legislation, including the Care Act 2014, the Health and Social Care Act 2008, the Safeguarding Vulnerable Groups Act 2006, and the Equality Act 2010. These laws guide the way safeguarding must be handled across care settings, ensuring that vulnerable individuals receive the protection and care they need.
- Quality Assurance: Primus Plus Healthcare will undergo regular internal audits and reviews of its safeguarding practices to ensure compliance with legal standards and identify any areas for improvement. This continuous review process ensures that safeguarding remains a priority in all service areas.

1.5 Support Service Users

The safety and well-being of Service Users are paramount, and this policy ensures that they have access to the support, advocacy, and resources they need throughout the safeguarding process.

- Access to Advocacy: Service Users will have access to independent advocates who can support them in safeguarding matters, helping to ensure their voice is heard and that they are fully informed and involved in any decisions that affect their well-being.
- Specialist Support Services: Where abuse or neglect is suspected or identified, Service Users will be referred to appropriate external services for emotional support, counselling, legal assistance, or therapeutic care. These services will be tailored to meet the needs of individuals with learning disabilities, mental health needs, or autism spectrum conditions.

- Promoting Autonomy and Dignity: Throughout the safeguarding process, Service Users will be supported to maintain their independence and dignity, while also ensuring that their safety is the primary concern. The service will work to empower Service Users by respecting their choices and involving them in safeguarding decisions to the greatest extent possible.

1.6 Tailored to Supported Living without Personal Care

This policy is specifically designed for Supported Living without Personal Care, where individuals receive housing-related support, but not personal care services. While personal care services (such as help with bathing, dressing, or eating) are not part of the service offering, the safeguarding policy will cover critical aspects of supported living to ensure that all Service Users are safe and supported.

- Support Services Focus: Safeguarding within supported living will focus on housing-related support and the associated risks of living in a communal or independent living environment. This includes risks related to tenancy rights, access to community resources, and interactions with staff or other residents.
- Vulnerability Considerations: Service Users with learning disabilities, mental health needs, and autism spectrum conditions may face increased vulnerabilities in these settings. The policy will ensure that these vulnerabilities are identified, and appropriate safeguards are put in place, particularly in terms of social interactions, access to services, and community integration.
- External Relationships: While personal care is not provided, safeguarding efforts will focus on managing relationships between Service Users, staff, and external contractors, ensuring that Service Users are protected from harm and exploitation through proper screening, oversight, and intervention when necessary.

1.7 Reflection of UK Safeguarding Adults Policy and Procedure

This policy is aligned with the national standards set out by UK safeguarding bodies, ensuring consistency and compliance with best practices across supported living services in the UK.

- Local Authority and LSAB Collaboration: As required by the Care Act 2014, Primus Plus Healthcare will collaborate with Local Safeguarding Adults Boards (LSABs) and Local Authority Safeguarding Teams to ensure that safeguarding practices are consistent with local and national standards.
- Best Practice Frameworks: This policy reflects the NICE Safeguarding Guidelines and Skills for Care Standards, ensuring that all staff are trained in the latest best practices for safeguarding adults with learning disabilities, mental health needs, and autism spectrum conditions.

2.0 SCOPE

This Safeguarding Adults Policy and Procedure applies to all services provided by Primus Plus Healthcare within its Supported Living without Personal Care service. It sets out the safeguarding measures and responsibilities designed to protect adults at risk, particularly those with learning disabilities, mental health needs, and autism spectrum conditions, from abuse, neglect, and exploitation in the supported living environment.

2.1 Individuals Covered

This policy applies to the following individuals involved in the delivery of Supported Living without Personal Care services:

- All Staff: This includes permanent, temporary, full-time, part-time, and sessional staff, including those in direct care roles, management, and administrative positions.
- Volunteers and Students: Volunteers and students on placement who are involved in providing or supporting services for Service Users.
- Contractors and Agency Workers: Any external contractors, agency workers, or consultants engaged by Primus Plus Healthcare who provide support services, including housing-related support, security, maintenance, and health or social care-related services.
- Self-Employed Individuals: Self-employed workers contracted by Primus Plus Healthcare to provide services, including support staff, cleaners, or maintenance personnel.
- Board Members and Directors: Senior leaders and board members responsible for overseeing the governance and strategic direction of Primus Plus Healthcare.
- Families and Carers: Informal carers, family members, or advocates who are involved in the support and well-being of Service Users.

2.2 Service Users Covered

This policy applies to all Service Users receiving Supported Living without Personal Care services from Primus Plus Healthcare, specifically focusing on the following:

- Adults with Learning Disabilities: Individuals with cognitive, developmental, and intellectual disabilities that impact their ability to live independently without support.
- Adults with Mental Health Needs: Individuals experiencing mental health conditions who may require support in managing daily living tasks, social interactions, and mental well-being.
- Adults with Autism Spectrum Conditions: Individuals on the autism spectrum who may experience difficulties in social interactions, communication, and restricted or repetitive patterns of behavior, requiring tailored support and safeguarding measures.

These Service Users may be funded in a variety of ways, including but not limited to:

- Self-Funding: Individuals who pay for their own care and support services.
- Direct Payments: People receiving funding directly from local authorities or NHS bodies to arrange their own care and support services.
- NHS Continuing Healthcare: Individuals eligible for NHS Continuing Healthcare (CHC) funding due to ongoing medical or care needs.
- Commissioned Services: Service Users who are referred or commissioned through local authorities, Integrated Care Boards (ICBs), or other public sector agencies.

2.3 Services Covered

This policy applies to all the services delivered under Supported Living without Personal Care, including but not limited to:

- Housing and Accommodation Support: Ensuring that Service Users have a safe, secure, and suitable living environment, with appropriate access to housing-related support services.
- Community Integration: Supporting Service Users to integrate into the wider community by helping them access public services, social groups, and community resources.
- Social and Emotional Support: Providing support for mental health, socialization, and emotional well-being, fostering independence, and encouraging social interactions.
- Risk Management and Advocacy: Ensuring that Service Users are supported in understanding their rights, making informed decisions, and accessing the appropriate services and advocacy.
- Health and Safety Support: Addressing environmental hazards or vulnerabilities within the accommodation or living situation, and providing support to access healthcare services as needed.
- Daily Living Skills Support: While personal care is not provided, assisting Service Users with maintaining their living space, managing daily living tasks such as budgeting, shopping, and meal preparation.
- Employment and Education Support: Supporting Service Users in accessing education, employment, and other opportunities for personal development and community participation.

2.4 Settings Covered

This policy is applicable across all settings where Primus Plus Healthcare provides Supported Living without Personal Care services, including:

- Service Users' Homes: The primary setting where housing-related support and daily living assistance are provided. This includes independent living accommodations, flats, or shared housing.
- Community Settings: Locations where Service Users are supported to participate in activities outside their homes, such as in parks, shops, day centres, or recreational areas.
- Transport Services: Support for Service Users using transport services, whether arranged by Primus Plus Healthcare or externally, to help them access community services, appointments, or social activities.
- Virtual and Remote Services: Where relevant, Primus Plus Healthcare may provide virtual support through telehealth services, online social support groups, or remote access to advocacy and information services.
- Emergency or Temporary Placements: Short-term or emergency accommodations where Service Users may be placed in urgent situations, or when transitional arrangements are required.

2.5 Activities Covered

The scope of this policy covers all activities associated with the care, support, and protection of Service Users in supported living environments, which include but are not limited to:

- Housing-Related Support: Assistance with maintaining tenancies, understanding housing rights, and accessing housing-related services.

- Care and Support Planning: Developing and reviewing care plans for Service Users, ensuring they are person-centered and designed to meet individual needs while protecting their rights and safeguarding against harm.
- Health Support and Referrals: Facilitating access to healthcare services, including physical health, mental health support, or specialist medical care, ensuring Service Users are supported to live healthier lives.
- Social and Emotional Well-being: Providing assistance for Service Users to manage emotional and psychological well-being through social activities, emotional support, and connections to mental health services when necessary.
- Risk Assessment and Management: Evaluating environmental, social, and personal risks to Service Users and implementing appropriate safeguards to ensure their safety and well-being.
- Financial Support: Assisting Service Users with budgeting, managing finances, and preventing financial exploitation or abuse.
- Staffing and Supervision: Ensuring that staff members involved in delivering support are adequately trained, supervised, and equipped to handle safeguarding concerns and maintain a high standard of care.
- Reporting and Investigation of Safeguarding Concerns: Addressing how concerns should be reported, investigated, and acted upon in the event of suspected abuse, neglect, or exploitation.

2.6 Legislative and Regulatory Frameworks Supporting this Scope

This Safeguarding Adults Policy and Procedure is supported by the following key legislative and regulatory frameworks:

- The Care Act 2014: Establishes the statutory framework for adult safeguarding, requiring local authorities and service providers to prevent and respond to abuse or neglect.
- The Health and Social Care Act 2008 (Regulated Activities) Regulations 2014: Particularly Regulation 13, which ensures that adults are safeguarded from abuse and improper treatment.
- CQC Fundamental Standards: These standards ensure that care services, including supported living services, are safe, effective, and responsive to the needs of Service Users.
- The Equality Act 2010: Ensures that safeguarding practices are inclusive and non-discriminatory, promoting the rights of individuals with protected characteristics.
- The Safeguarding Vulnerable Groups Act 2006: Governs the vetting and barring scheme, ensuring that unsuitable individuals do not work with vulnerable adults.
- The Mental Capacity Act 2005 and Deprivation of Liberty Safeguards (DoLS): Protects Service Users who may lack mental capacity, ensuring that decisions about their care and treatment are made in their best interests.
- NICE Guidelines: Provides guidance on best practices for safeguarding, particularly in relation to adults with learning disabilities, mental health needs, and autism spectrum conditions.

- Local Authority Safeguarding Procedures: Primus Plus Healthcare will follow the guidelines and procedures set by local safeguarding boards and agencies to ensure the protection of Service Users within specific geographical areas.

3.0 POLICY STATEMENT

Primus Plus Healthcare is fully committed to ensuring that all adults at risk, particularly those with learning disabilities, mental health needs, and autism spectrum conditions, are protected from abuse, neglect, and exploitation while receiving care and support in supported living services. The safety, dignity, and well-being of Service Users are at the core of our service delivery, and safeguarding is a priority across all aspects of our operations.

We recognize the responsibility to prevent harm, respond effectively to safeguarding concerns, and promote a culture of openness, transparency, and accountability. This policy sets out the organization's commitment to safeguarding and is designed to ensure that all staff, volunteers, contractors, and other stakeholders are aware of their roles and responsibilities in safeguarding adults at risk.

Primus Plus Healthcare acknowledges that safeguarding is not just a legal requirement but a moral obligation to uphold the rights of Service Users. Safeguarding practices are not limited to the response to incidents of abuse or neglect, but also focus on the prevention, promotion, and support aspects to ensure Service Users are protected in all aspects of their lives.

Principles of Safeguarding at Primus Plus Healthcare

3.1 Zero Tolerance of Abuse

We adopt a zero-tolerance approach to abuse, neglect, and exploitation. Abuse will not be tolerated under any circumstances, and immediate action will be taken to address any allegations or concerns that arise. The zero-tolerance approach means that:

- Any form of abuse, including physical, emotional, financial, sexual, and neglect, is unacceptable.
- Safeguarding concerns will be escalated swiftly to ensure timely intervention.
- Service Users will be supported in reporting concerns without fear of retribution or dismissal.
- Appropriate disciplinary action will be taken when abuse is identified, including removal of staff involved, ensuring the safety of the Service User is prioritized.

3.2 Person-Centered Approach

At Primus Plus Healthcare, we are committed to ensuring that the voice of the Service User is at the centre of all safeguarding processes. This approach ensures that:

- Service Users are empowered to make informed choices and decisions about their care and well-being.
- The preferences and dignity of each Service User will be respected whenever possible, ensuring that they are part of decisions that affect their lives.
- Person-centered care plans are created for each Service User, focusing on their individual needs, goals, and the support required to maintain their safety and dignity.
- A collaborative approach is taken with Service Users, families, and advocates to ensure that decisions are made based on the best interests of the individual.

3.3 Legal and Regulatory Compliance

Primus Plus Healthcare is fully committed to complying with all relevant national and local safeguarding laws, including:

- The Care Act 2014, which provides the statutory framework for safeguarding adults at risk, and outlines local authority duties to ensure that appropriate safeguarding measures are in place.
- Health and Social Care Act 2008, particularly Regulation 13, which mandates that all care providers must safeguard individuals from abuse and improper treatment.
- CQC Regulations, ensuring that the organization maintains high standards of care and meets the expectations for safeguarding as outlined by the Care Quality Commission.
- The Safeguarding Vulnerable Groups Act 2006, which ensures the safeguarding of individuals who may be at risk by ensuring that only suitable individuals are employed to provide care.
- The Equality Act 2010, which ensures that our safeguarding measures are inclusive and non-discriminatory, protecting all individuals regardless of their characteristics.
- Mental Capacity Act 2005, which ensures that safeguarding practices respect the autonomy and legal rights of individuals who may lack mental capacity, providing protections and support where needed.

Compliance with these laws is not just about meeting the minimum legal requirements but is also about maintaining the highest standards of care and protection for our Service Users.

3.4 Prevention of Abuse

We will take proactive steps to prevent abuse from occurring by promoting staff training, developing robust safeguarding procedures, and working closely with external agencies to ensure that all risks are managed effectively. Our prevention strategy includes:

- Staff Training: Ongoing training on the recognition of abuse, safeguarding protocols, and appropriate intervention strategies. This ensures that staff are well-equipped to prevent and respond to abuse.
- Risk Assessments: Regular, comprehensive risk assessments of both Service Users and the environment in which they live. Identifying potential risks allows for early intervention and proactive safeguarding measures.
- Clear Procedures: Developing clear safeguarding procedures that are easy to follow and accessible to all staff, ensuring consistency in response to concerns.
- Collaboration with External Agencies: Working with local authorities, healthcare providers, and other professionals to share knowledge, identify risks early, and provide additional support where necessary.

3.5 Clear Reporting and Investigation Procedures

At Primus Plus Healthcare, we recognize that safeguarding concerns must be reported and investigated quickly and effectively. All staff, volunteers, and contractors have a responsibility to report any concerns related to abuse or neglect, and there will be clear and accessible reporting procedures in place. These procedures ensure that:

- Concerns are taken seriously: All safeguarding concerns raised by staff, Service Users, or their families will be treated with the utmost importance.

- Timely and appropriate investigations: Every report will be investigated thoroughly, impartially, and in a timely manner to identify the cause and take necessary actions.
- External involvement: When necessary, safeguarding concerns will be escalated to relevant external authorities, such as the Local Authority Safeguarding Adults Team, CQC, and the Disclosure and Barring Service (DBS).
- Support for those raising concerns: Staff, Service Users, and families who raise safeguarding concerns will be supported throughout the reporting process, ensuring their safety and protection.

3.6 Support for Victims of Abuse

If a safeguarding concern is raised, the safety and well-being of the affected individual will be our primary concern. Service Users who have been affected by abuse will be supported throughout the safeguarding process. This support includes:

- Access to Advocacy: Ensuring that Service Users have access to independent advocates who can help them navigate the safeguarding process and ensure their voice is heard.
- Specialist Support Services: Providing access to specialized services such as mental health professionals, legal advisors, or trauma counsellors to support Service Users through recovery.
- Person-Centered Support Plans: Ensuring that Service Users receive tailored support to help them recover from the trauma of abuse, while promoting their autonomy and well-being.
- Ongoing Monitoring: Ensuring that Service Users continue to receive the support they need post-incident, including follow-up care and regular reviews to monitor their progress.

3.7 Staff Responsibility

Every individual at Primus Plus Healthcare, including staff, volunteers, and contractors, has a duty of care to protect adults at risk from harm. All employees are required to undergo safeguarding training and must act in accordance with the procedures outlined in this policy. Specifically, staff must:

- Report safeguarding concerns immediately and in accordance with the reporting procedures.
- Respond appropriately to any signs of abuse or neglect and take immediate action to prevent further harm.
- Be vigilant in recognizing potential risks and actively contribute to a safeguarding culture.
- Support colleagues in safeguarding responsibilities and assist in investigations when necessary.

Staff will also be supported in raising concerns, with a whistleblowing policy in place to protect them from any retaliation or discrimination for reporting safeguarding issues in good faith.

3.8 Continuous Improvement

Primus Plus Healthcare is committed to continuous improvement in its safeguarding practices. To ensure that our safeguarding efforts remain effective and up-to-date, we will:

- Regularly review safeguarding policies and procedures to ensure they reflect the latest regulations and best practices.
- Learn from safeguarding incidents, audits, and feedback from Service Users and staff to identify areas of improvement and implement corrective actions.
- Involve Service Users and stakeholders in feedback processes to continuously enhance safeguarding protocols.
- Adapt to emerging risks: Regularly assess and respond to new or emerging safeguarding challenges to ensure that the organization remains agile and responsive.

4.0 OBJECTIVE

The objective of this Safeguarding Adults Policy and Procedure at Primus Plus Healthcare is to establish a clear, effective, and comprehensive approach to safeguarding adults at risk, ensuring that all Service Users, particularly those with learning disabilities, mental health needs, and autism spectrum conditions, are protected from abuse, neglect, and exploitation while receiving care and support in Supported Living without Personal Care services. This policy aims to prevent harm, ensure service users' safety, promote their well-being, and create an environment where they can thrive with dignity and respect.

This safeguarding framework is designed to comply with all relevant CQC regulations, national legislation, and best practices in safeguarding adults at risk. It outlines the specific actions and responsibilities for Primus Plus Healthcare to uphold the rights, safety, and welfare of Service Users and to meet all regulatory standards required under the Health and Social Care Act 2008, Care Act 2014, and other relevant legal frameworks.

4.1 Ensure Full Compliance with Safeguarding Legislation and CQC Regulations

Primus Plus Healthcare is committed to ensuring that safeguarding practices comply with the following key regulations and legal frameworks:

- Care Act 2014: Under the Care Act 2014, Primus Plus Healthcare is legally required to implement safeguarding procedures that prevent and respond to abuse or neglect of adults at risk. This policy ensures the organization's compliance with Section 42 of the Care Act 2014, which requires safeguarding enquiries when an adult at risk is suspected to be experiencing abuse or neglect.
- Health and Social Care Act 2008 (Regulated Activities) Regulations 2014: In particular, Regulation 13 addresses safeguarding from abuse and improper treatment. This policy aligns with Regulation 13, ensuring that Service Users are safeguarded from abuse and that there are robust systems in place to detect and address any form of harm.
- CQC Fundamental Standards: The CQC Fundamental Standards set out requirements for safe, effective, and compassionate care. Primus Plus Healthcare adheres to these standards, particularly under the "Safe" key line of enquiry (KLOE), ensuring that safeguarding practices are integral to the care provided to Service Users and are continuously monitored and reviewed.
- The Safeguarding Vulnerable Groups Act 2006: This act governs the Disclosure and Barring Service (DBS) and requires that appropriate checks are conducted to prevent unsuitable individuals from working with vulnerable adults. This policy ensures that all staff undergo DBS checks and meet required standards before being employed.

- The Equality Act 2010: This policy reflects the principles of the Equality Act 2010, ensuring that safeguarding practices are non-discriminatory and inclusive, and that all Service Users receive equal protection from abuse, neglect, or exploitation, regardless of their personal characteristics.
- The Mental Capacity Act 2005 and Deprivation of Liberty Safeguards (DoLS): The Mental Capacity Act 2005 provides a framework for making decisions for individuals who lack mental capacity, and DoLS ensures that any deprivation of liberty is lawful. This policy ensures compliance with these laws, promoting safeguarding for individuals who may lack the capacity to make decisions about their own care.

This objective ensures that Primus Plus Healthcare is compliant with all relevant regulations, providing high-quality, person-centered care that protects adults at risk from abuse and neglect.

4.2 Prevent Abuse, Neglect, and Exploitation

One of the key objectives of this policy is to take proactive measures to prevent abuse, neglect, and exploitation of Service Users. Primus Plus Healthcare will:

- Conduct Regular Risk Assessments: To identify any potential risks that Service Users may face in the supported living environment, including risks related to housing, community interactions, and staff or contractor conduct. This is in line with CQC Regulation 12, which requires that services are provided in a safe manner.
- Implement Preventative Measures: Including regular safeguarding training for staff and volunteers, raising awareness about abuse, and fostering a culture where safeguarding is prioritized. Training will cover identification and prevention of various types of abuse (e.g., physical, emotional, financial, neglect, and sexual abuse).
- Adopt a Robust Recruitment Process: Primus Plus Healthcare will follow safe recruitment practices in line with the Safeguarding Vulnerable Groups Act 2006, ensuring that only individuals who are safe and suitable to work with vulnerable adults are hired. All staff will undergo DBS checks, and recruitment procedures will include thorough background screening.
- Monitor Staff Practices: Supervising and supporting staff to ensure that safeguarding policies are being followed and that staff behavior is in line with best practices for the protection of Service Users.

By implementing these preventive measures, Primus Plus Healthcare will minimize the risks of abuse and ensure that Service Users live in a safe and supportive environment.

4.3 Promote Awareness and Education on Safeguarding

To foster a culture of safeguarding, Primus Plus Healthcare will ensure that safeguarding awareness is embedded at all levels of the organization. This includes:

- Training for All Staff: All staff, volunteers, and contractors will receive regular and comprehensive training on safeguarding. This training will cover how to identify, report, and respond to concerns about abuse, neglect, and exploitation, and will be tailored to the specific needs of Service Users with learning disabilities, mental health needs, and autism spectrum conditions. The training will align with CQC's recommendations and the Skills for Care safeguarding framework.
- Educate Service Users and Families: Primus Plus Healthcare will ensure that Service Users are educated about their rights and how to report concerns. Information will be

provided in accessible formats to ensure that all individuals, including those with communication difficulties, can understand how to raise safeguarding concerns.

- Engagement with Families and Carers: Primus Plus Healthcare will engage families and informal carers to ensure they understand the safeguarding processes and are encouraged to report any concerns. This will be supported by clear communication about safeguarding rights and responsibilities.

Through these actions, Primus Plus Healthcare will create a well-informed environment where everyone involved is aware of safeguarding concerns and knows how to take appropriate action.

4.4 Respond to Safeguarding Concerns Promptly and Effectively

Primus Plus Healthcare ensures that safeguarding concerns are handled effectively through clear reporting and investigation procedures:

- Clear Reporting Procedures: All staff, volunteers, and contractors will know exactly how to report safeguarding concerns. These procedures will ensure that concerns are reported promptly to the designated safeguarding lead or the management team, and that concerns are escalated to the appropriate authorities, such as the Local Authority Safeguarding Adults Team, CQC, or the DBS.
- Investigation Process: Safeguarding concerns will be investigated thoroughly, impartially, and in a timely manner. Primus Plus Healthcare will work closely with local authorities, the CQC, and any other relevant agencies to ensure that investigations are comprehensive and any risks to Service Users are addressed quickly.
- Immediate Action: In cases of imminent risk, immediate protective actions will be taken, such as separating the Service User from potential harm, calling emergency services if necessary, and notifying external safeguarding bodies.

The goal is to resolve safeguarding concerns swiftly, ensuring that the safety of Service Users is restored and any necessary corrective actions are taken.

4.5 Provide Support for Victims of Abuse

The well-being and recovery of Service Users who have been affected by abuse or neglect are of utmost importance. This policy ensures that:

- Victims of Abuse Are Supported: Primus Plus Healthcare will ensure that any Service User who has been a victim of abuse is provided with appropriate support, including access to independent advocacy, counselling, and other specialist services. This is in line with CQC Regulation 9, which emphasizes that care must be person-centered and promote well-being.
- Ongoing Monitoring and Support: Service Users will continue to receive support and monitoring throughout the safeguarding process and beyond, ensuring their recovery and ongoing safety. This may include adjustments to care plans, emotional support, and follow-up care to ensure that Service Users are protected from future harm.

4.6 Foster a Culture of Accountability and Transparency

To ensure that safeguarding practices are effective, Primus Plus Healthcare will promote a culture of accountability and transparency:

- Regular Audits and Reviews: Safeguarding practices will be regularly reviewed and audited to ensure they are effective and compliant with CQC regulations and national safeguarding frameworks.

- Leadership Accountability: The management team at Primus Plus Healthcare will take responsibility for safeguarding practices, ensuring that policies are implemented effectively and that staff are held accountable for their actions.
- Service User and Staff Feedback: Primus Plus Healthcare will encourage feedback from Service Users and staff to continuously improve safeguarding procedures, ensuring that concerns are addressed and that lessons are learned from any incidents.

4.7 Continuously Improve Safeguarding Practices

As part of our commitment to providing the highest quality of care, Primus Plus Healthcare will continuously monitor, evaluate, and improve its safeguarding practices:

- Ongoing Evaluation: Safeguarding policies will be reviewed and updated regularly to reflect changes in legislation, best practices, and the needs of Service Users.
- Learning from Incidents: We will analyse any safeguarding incidents to identify root causes and ensure that any necessary improvements are made to prevent similar occurrences in the future.

5.0 LEGAL AND REGULATORY FRAMEWORK

Primus Plus Healthcare is committed to adhering to the highest standards of safeguarding practices, ensuring that all Service Users, particularly those with learning disabilities, mental health needs, and autism spectrum conditions, are protected from abuse, neglect, and exploitation in line with UK safeguarding laws and regulations. This section outlines the key legal and regulatory frameworks that underpin the safeguarding practices within the organization and ensures compliance with national and local standards.

Primus Plus Healthcare recognizes that safeguarding is not just about responding to abuse, but also about creating an environment where Service Users are empowered to live free from harm, with their rights and well-being protected. The legal and regulatory frameworks listed below provide a foundation for safeguarding within Primus Plus Healthcare's Supported Living without Personal Care services.

5.1 Care Act 2014

The Care Act 2014 is the primary piece of legislation guiding adult safeguarding in England. It provides the statutory framework for adult safeguarding and sets out the duties of local authorities, care providers, and other agencies to prevent, identify, and respond to abuse and neglect. Specifically, Primus Plus Healthcare ensures the following in line with the Care Act 2014:

- Section 42 Duty: Under Section 42 of the Care Act 2014, local authorities are required to make enquiries when an adult at risk is suspected of experiencing abuse or neglect. Primus Plus Healthcare ensures that appropriate safeguarding enquiries are made and that risks to Service Users are swiftly addressed.
- Well-being Principle: The Care Act emphasizes the well-being of individuals. The policy ensures that all safeguarding measures support Service Users to live independent lives with dignity, and that their views, wishes, and preferences are respected throughout the safeguarding process.
- Prevention of Abuse: The Care Act places a focus on preventing abuse by ensuring care services meet high standards, and Primus Plus Healthcare has implemented proactive safeguarding strategies such as risk assessments and staff training.

- Safeguarding Adults Boards (SABs): Primus Plus Healthcare works closely with Local Safeguarding Adults Boards (LSABs) to ensure multi-agency collaboration and that safeguarding practices align with local protocols and best practices.

By aligning with the Care Act 2014, Primus Plus Healthcare ensures that all Service Users are safeguarded from abuse and neglect and that the principles of the Act are embedded in our care delivery.

5.2 Health and Social Care Act 2008 (Regulated Activities) Regulations 2014

Under the Health and Social Care Act 2008, the CQC regulates all health and social care providers in England. Regulation 13 of the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014 specifically addresses the safeguarding of Service Users from abuse and improper treatment. This regulation requires care providers like Primus Plus Healthcare to:

- Prevent Abuse and Neglect: Ensure that the Supported Living without Personal Care services provided are free from abuse, neglect, and exploitation. This includes conducting regular risk assessments, maintaining appropriate staffing levels, and ensuring that all staff are trained in safeguarding principles.
- Protection from Improper Treatment: Safeguard against any form of improper treatment, including neglect and exploitation, ensuring that Service Users are treated with dignity and respect at all times.
- Staffing and Supervision: Ensure that all staff members are adequately trained and supervised to provide high-quality, safe care and that any safeguarding concerns are addressed promptly and effectively.

By complying with Regulation 13, Primus Plus Healthcare ensures that safeguarding practices are robust and aligned with national standards, protecting Service Users from harm in every aspect of care delivery.

5.3 CQC Fundamental Standards

The CQC Fundamental Standards are the core standards that care providers must meet to ensure that Service Users are protected and that they receive safe and high-quality care. These standards cover a wide range of areas, but for safeguarding, the key standards include:

- Safe Care and Treatment: The fundamental principle under the "Safe" Key Line of Enquiry (KLOE) ensures that care is provided in a safe manner, without causing harm or distress. Primus Plus Healthcare complies with these standards by maintaining a safe living environment, conducting regular risk assessments, and ensuring that all care delivery is aligned with best practices.
- Person-Centered Care: Under the "Caring" KLOE, care must be person-centered, respecting each Service User's preferences, needs, and values. Primus Plus Healthcare ensures that all safeguarding practices are person-centered, promoting autonomy and dignity.
- Governance and Transparency: Under the "Well-Led" KLOE, leadership must foster a culture of openness, transparency, and accountability. This includes regular audits, monitoring, and review of safeguarding practices, ensuring that concerns are addressed, and lessons are learned from safeguarding incidents.

By adhering to the CQC Fundamental Standards, Primus Plus Healthcare ensures that its safeguarding practices meet national expectations and contribute to the delivery of high-quality care.

5.4 Safeguarding Vulnerable Groups Act 2006

The Safeguarding Vulnerable Groups Act 2006 establishes the Disclosure and Barring Service (DBS) to ensure that individuals who pose a risk to vulnerable adults are barred from working with them. Primus Plus Healthcare ensures compliance with this Act by:

- DBS Checks for All Staff: Ensuring that all staff, volunteers, and contractors undergo enhanced DBS checks to assess their suitability to work with vulnerable adults, particularly in environments such as Supported Living where direct care is not provided but potential risks may still arise.
- Referral to DBS: If any staff member is found to be unsuitable to work with vulnerable adults due to safeguarding concerns, Primus Plus Healthcare will make appropriate referrals to the DBS as required by the Safeguarding Vulnerable Groups Act.

By complying with this Act, Primus Plus Healthcare ensures that all employees and contractors are properly vetted, reducing the risk of harm to Service Users.

5.5 The Equality Act 2010

The Equality Act 2010 prohibits discrimination and promotes equality of opportunity. Primus Plus Healthcare adheres to the Equality Act 2010 by ensuring that:

- Non-Discriminatory Safeguarding: All Service Users are treated equally, regardless of their disability, race, age, gender, or other protected characteristics. Safeguarding practices are designed to prevent discrimination and ensure that every Service User receives fair and respectful treatment.
- Inclusive Safeguarding: The policy ensures that safeguarding procedures are inclusive and accessible to all Service Users, particularly those with learning disabilities, mental health needs, and autism spectrum conditions, ensuring their voices are heard in safeguarding processes.

This compliance ensures that Service Users receive equal protection and support under safeguarding procedures, fostering an environment of inclusion and respect.

5.6 The Mental Capacity Act 2005 and Deprivation of Liberty Safeguards (DoLS)

The Mental Capacity Act 2005 (MCA) provides the framework for making decisions on behalf of individuals who may lack the capacity to make decisions for themselves. Primus Plus Healthcare ensures compliance with the MCA by:

- Assessing Capacity: Primus Plus Healthcare will assess the mental capacity of Service Users when needed, ensuring that decisions are made in their best interests, particularly if safeguarding interventions are required.
- Deprivation of Liberty Safeguards (DoLS): In situations where a Service User's liberty may need to be restricted for their safety, Primus Plus Healthcare ensures compliance with DoLS to ensure that any restrictions are lawful and proportionate.
- Person-Centered Approach: Under the MCA, Primus Plus Healthcare ensures that safeguarding interventions are as least restrictive as possible, respecting Service Users' autonomy while also ensuring their safety.

By complying with the Mental Capacity Act 2005 and DoLS, Primus Plus Healthcare ensures that Service Users who may lack capacity are protected in a way that respects their rights and dignity.

5.7 The Human Rights Act 1998

The Human Rights Act 1998 enshrines the right to freedom, dignity, and liberty for all individuals. Primus Plus Healthcare ensures that safeguarding practices respect these rights by:

- Right to Dignity and Privacy: Ensuring that all Service Users are treated with dignity and respect, particularly when safeguarding issues arise.
- Freedom from Inhuman or Degrading Treatment: Ensuring that all safeguarding practices are aligned with the prohibition of torture or inhuman or degrading treatment or punishment.

By adhering to the Human Rights Act, Primus Plus Healthcare upholds the fundamental rights of Service Users while implementing safeguarding measures.

6.0 DEFINITIONS

In the context of this Safeguarding Adults Policy and Procedure, the following definitions are provided to ensure clarity in the understanding and implementation of safeguarding practices at Primus Plus Healthcare. These definitions align with CQC requirements, national safeguarding legislation, and best practice guidelines, ensuring that all staff, volunteers, and contractors are aware of the key terms used within this policy.

6.1 Abuse

Abuse refers to a violation of an individual's human and civil rights, resulting in harm, distress, or exploitation. Abuse can take many forms, and each type has distinct signs and effects on Service Users. Primus Plus Healthcare adheres to the definitions of abuse set out in the Care Act 2014 and other relevant legislation.

- Physical Abuse: The infliction of physical harm on an individual, including hitting, slapping, kicking, misuse of medication, or inappropriate use of restraint. This may result in physical injuries such as bruises, fractures, or burns.
    - Relevant Legislation: Health and Social Care Act 2008 (Regulated Activities) Regulations 2014, Regulation 13.
- Sexual Abuse: Any form of sexual activity or behavior without consent, including rape, sexual assault, inappropriate touching, and exploitation.
    - Relevant Legislation: Sexual Offences Act 2003, Care Act 2014.
- Emotional or Psychological Abuse: Actions that cause emotional harm, including threats, intimidation, verbal abuse, humiliation, or isolation. This form of abuse can have lasting effects on mental health and well-being.
    - Relevant Legislation: Care Act 2014, Equality Act 2010.
- Financial or Material Abuse: The exploitation of an individual's finances, including theft, fraud, and the misuse of property, benefits, or assets.
    - Relevant Legislation: Fraud Act 2006, Care Act 2014.

- Neglect: The failure to provide necessary care, resulting in harm or risk to an individual's health, safety, or well-being. This includes the withholding of food, medical care, or other basic needs.
    - Relevant Legislation: Care Act 2014, Health and Social Care Act 2008 (Regulated Activities) Regulations 2014, Regulation 13.
- Discriminatory Abuse: Abuse based on the characteristics of an individual, such as race, gender, disability, age, or sexual orientation, including exclusion or denial of service.
    - Relevant Legislation: Equality Act 2010, Care Act 2014.
- Modern Slavery: This includes slavery, servitude, forced labour, and human trafficking. Individuals are coerced into work or services under threat, often in hidden or exploitative conditions.
    - Relevant Legislation: Modern Slavery Act 2015, Care Act 2014.
- Organizational (Institutional) Abuse: Abuse that occurs within a care setting due to poor practices, lack of staff training, rigid routines, or failure to respect Service Users' dignity and rights.
    - Relevant Legislation: Care Act 2014, CQC Regulations.
- Self-Neglect: A person's failure to care for their own basic needs, leading to potential health risks, poor hygiene, and unsafe living conditions.
    - Relevant Legislation: Care Act 2014.

6.2 Adult at Risk

An Adult at Risk is defined as an individual aged 18 or older who:

- Has care and support needs (whether or not those needs are being met).
- Is experiencing, or is at risk of, abuse, neglect, or exploitation.
- Is unable to protect themselves from harm due to their care and support needs.

This definition is based on the Care Act 2014, which emphasizes the need for safeguarding for any adult who meets these criteria.

- Relevant Legislation: Care Act 2014, Health and Social Care Act 2008 (Regulated Activities) Regulations 2014, Regulation 13.

6.3 Safeguarding Concern

A Safeguarding Concern is any situation where there is suspicion, evidence, or a report of abuse, neglect, or exploitation of an adult at risk. This can include incidents witnessed by staff, reported by Service Users, or identified through regular monitoring and audits. The concern must be reported and investigated following the safeguarding procedures outlined in this policy.

- Relevant Legislation: Care Act 2014, Health and Social Care Act 2008 (Regulated Activities) Regulations 2014, Regulation 13, CQC Regulations.

6.4 Safeguarding Lead

The Safeguarding Lead is a designated individual within Primus Plus Healthcare who is responsible for overseeing the safeguarding process, ensuring that all safeguarding concerns are reported, investigated, and addressed appropriately. The Safeguarding Lead will also be

responsible for ensuring compliance with this policy, coordinating training, and liaising with external agencies when necessary.

- Relevant Legislation: Care Act 2014, CQC Regulations.

6.5 Mental Capacity

Mental Capacity refers to an individual's ability to make decisions for themselves, including decisions about their care, treatment, and welfare. The Mental Capacity Act 2005 sets out the framework for assessing whether an individual has capacity to make specific decisions, and for ensuring that individuals who lack capacity are supported to make decisions in their best interests.

- Relevant Legislation: Mental Capacity Act 2005, Care Act 2014.

6.6 Deprivation of Liberty (DoL)

Deprivation of Liberty occurs when a person is confined in a way that they cannot leave, even though they may not want to be in that situation. The Deprivation of Liberty Safeguards (DoLS) are part of the Mental Capacity Act 2005 and ensure that any deprivation of liberty is lawful and that individuals are protected from unnecessary restrictions on their freedom.

- Relevant Legislation: Mental Capacity Act 2005, Deprivation of Liberty Safeguards (DoLS), Care Act 2014.

6.7 Capacity to Consent

Capacity to Consent refers to an individual's ability to understand and make decisions about their care, including the ability to give or refuse consent to particular interventions, treatments, or safeguarding actions. If a Service User lacks capacity, decisions must be made in their best interests, in line with the Mental Capacity Act 2005.

- Relevant Legislation: Mental Capacity Act 2005, Care Act 2014.

6.8 Whistleblowing

Whistleblowing is the act of reporting concerns about wrongdoing or unsafe practices, including safeguarding violations, within an organization. Primus Plus Healthcare supports whistleblowing as a vital part of safeguarding, ensuring that individuals can raise concerns without fear of retaliation or discrimination. All staff are encouraged to report concerns, and protections are in place for those who make disclosures in good faith.

- Relevant Legislation: Public Interest Disclosure Act 1998, Care Act 2014.

6.9 Reporting Procedures

Reporting Procedures refer to the clearly defined steps that staff, volunteers, and others involved with Primus Plus Healthcare must follow to report safeguarding concerns. These procedures ensure that concerns are raised in a timely and appropriate manner, and that the necessary actions are taken to protect the Service User and investigate the concern.

- Relevant Legislation: Care Act 2014, Health and Social Care Act 2008 (Regulated Activities) Regulations 2014, CQC Regulations.

6.10 Risk Assessment

A Risk Assessment is the process of identifying potential risks to a Service User's safety and well-being. This includes the likelihood of abuse, neglect, or exploitation occurring and the potential consequences for the individual. Primus Plus Healthcare conducts regular risk assessments to mitigate these risks and ensure the safety of Service Users.

- Relevant Legislation: Care Act 2014, Health and Social Care Act 2008 (Regulated Activities) Regulations 2014, CQC Regulations.

7.0 ROLES AND RESPONSIBILITIES

At Primus Plus Healthcare, safeguarding is a shared responsibility across all levels of the organization. Each individual involved in the care and support of Service Users has a specific role to play in ensuring that Service Users are protected from abuse, neglect, and exploitation. This section outlines the key roles and responsibilities for safeguarding at Primus Plus Healthcare, referencing the relevant CQC regulations and UK safeguarding laws.

7.1 Senior Leadership and Management Team

Senior leadership at Primus Plus Healthcare, including the CEO, directors, and senior managers, holds ultimate responsibility for ensuring that safeguarding practices are embedded throughout the organization. Their roles and responsibilities include:

- Establishing Safeguarding Culture: Senior leadership ensures that safeguarding is prioritized throughout the organization, creating a culture of openness, transparency, and accountability.
- Oversight of Safeguarding Practices: Ensure that safeguarding procedures are being implemented effectively across all service areas and are reviewed regularly to comply with CQC and other regulatory requirements.
- Compliance with Regulations: Ensure that Primus Plus Healthcare complies with CQC Regulations, including Regulation 13 (Safeguarding Service Users from Abuse and Improper Treatment), as well as other relevant national laws, such as the Care Act 2014 and Health and Social Care Act 2008.
- Resource Allocation: Allocate sufficient resources to safeguarding activities, including training, staffing, and access to advocacy and support services for Service Users.
- Regular Audits and Reviews: Conduct regular audits and performance reviews of safeguarding practices, investigating incidents of abuse or neglect, and using the findings to continuously improve practices and reduce risks.

By upholding these responsibilities, senior leadership ensures that safeguarding remains a priority and is embedded in the organization's operational framework.

Relevant Regulations:

- Health and Social Care Act 2008 (Regulated Activities) Regulations 2014, Regulation 13
- Care Act 2014, CQC Fundamental Standards

7.2 Designated Safeguarding Lead (DSL), Registered Manager, and Nominated Individual

Jonas Ayitevie plays a critical role at Primus Plus Healthcare as the Designated Safeguarding Lead (DSL)**,** Registered Manager**,** and Nominated Individual. In each of these capacities, Jonas Ayitevie is responsible for overseeing and ensuring the highest standards of safeguarding practices, regulatory compliance, and organizational governance. Below are his key roles and responsibilities:

7.2.1 Designated Safeguarding Lead (DSL)

As the DSL**,** Jonas Ayitevie is responsible for overseeing safeguarding procedures, ensuring that Service Users are protected from abuse, neglect, and exploitation. His key duties include:

- Coordinating Safeguarding Activities**:** Ensuring that all safeguarding concerns are handled promptly, investigated thoroughly, and reported to the appropriate authorities, including CQC, local safeguarding teams, and the Disclosure and Barring Service (DBS)**.**
- Staff Training: Overseeing and ensuring that all staff, volunteers, and contractors receive comprehensive safeguarding training, including recognizing signs of abuse and the correct procedures for reporting concerns.
- Liaison with External Agencies: Acting as the primary point of contact with external bodies such as the Local Authority Safeguarding Adults Team**,** CQC, and the police when concerns are raised.
- Support for Victims: Ensuring access to specialist support for Service Users who are victims of abuse, including independent advocacy, legal services, and therapeutic care.
- Safeguarding Policy Review: Regularly reviewing and updating the safeguarding policy to reflect changes in legislation, CQC requirements, and best practice standards.

Designated Safeguarding Lead Contact Details:

Name: Jonas Ayitevie

Address: 603 London Road, Westcliff on Sea, Southend on Sea, Essex, SS0 9PE

Phone: +44 7359 402911

Email: care@primusplus.co.uk

7.2.2 Registered Manager and Nominated Individual

Jonas Ayitevie, in his dual roles as Registered Manager and Nominated Individual, holds overall responsibility for ensuring that Primus Plus Healthcare provides safe, effective, and person-centered care while complying with all relevant regulations. His key duties and responsibilities include:

Operational Management

- Overseeing the day-to-day delivery of care and support to Service Users, ensuring that all care plans are effectively implemented and that Service Users' needs are met according to their preferences and goals.
- Ensuring that the care environment remains safe, welcoming, and supportive, fostering a culture where Service Users feel respected, valued, and protected from harm.

Regulatory Compliance

- Ensuring Primus Plus Healthcare complies with all relevant regulatory requirements set by the CQC and other external bodies. This includes adherence to the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014, specifically Regulation 13 (Safeguarding Service Users from Abuse and Improper Treatment).
- Managing the organization’s response to CQC inspections and ensuring compliance with the CQC Fundamental Standards, maintaining high standards of care and safeguarding for Service Users.

- Ensuring adherence to national and local laws, including the Care Act 2014, Mental Capacity Act 2005, and Safeguarding Vulnerable Groups Act 2006, to protect adults at risk.

Staff Management and Development

- Managing the recruitment, training, and ongoing performance of staff, ensuring that all employees are equipped to deliver high-quality, safe care that aligns with Primus Plus Healthcare's values.
- Providing regular supervision and professional development opportunities, fostering a culture of continuous improvement and accountability among the team.
- Ensuring that all staff receive comprehensive safeguarding training, including recognizing and reporting signs of abuse, neglect, and exploitation, and understanding the correct procedures for escalating concerns.

Quality Assurance and Continuous Improvement

- Monitoring the quality of care and identifying areas for improvement through regular audits, feedback from Service Users, and incident reporting. Ensuring that quality assurance processes are in place to drive improvements in service delivery.
- Ensuring that all practices comply with the CQC's Fundamental Standards, addressing any areas of concern or non-compliance, and taking prompt corrective actions when required.

Fostering a Culture of Safeguarding

- Embedding safeguarding as a core aspect of the organization's culture, ensuring that safeguarding is prioritized at all levels of the service. This includes maintaining open lines of communication, promoting a safe environment, and ensuring that all staff members are actively engaged in safeguarding activities.
- Providing leadership in the development and continuous review of the safeguarding policy, ensuring that it reflects current best practices, CQC requirements, and any changes in safeguarding legislation.

Reporting and Escalation

- Acting as the point of contact with CQC, local authorities, and other external bodies to report any serious incidents, safeguarding concerns, or regulatory breaches. Ensuring timely escalation of safeguarding issues to the relevant authorities, including the Local Authority Safeguarding Adults Team, CQC, and the Disclosure and Barring Service (DBS), as required by law.
- Ensuring that safeguarding concerns are addressed thoroughly, with clear documentation and appropriate follow-up actions, in line with CQC Regulation 13 and the Care Act 2014.

Registered Manager and Nominated Individual Contact Details:

Name: Jonas Ayitevie
Position: Registered Manager, and Nominated Individual
Address: 603 London Road, Westcliff on Sea, Southend on Sea, Essex, SS0 9PE
Phone: +44 7359 402911

Email: care@primusplus.co.uk

7.3 All Staff, Volunteers, and Contractors

All employees, volunteers, and contractors have a personal responsibility for safeguarding and promoting the well-being of Service Users. Their responsibilities include:

- Recognizing and Reporting Concerns: Every staff member, volunteer, and contractor is responsible for recognizing signs of abuse, neglect, or exploitation, and reporting their concerns immediately according to the safeguarding reporting procedures.
- Following Safeguarding Procedures: Adhere to the organization's safeguarding procedures, ensuring that concerns are raised and escalated in accordance with the policy.
- Respecting Dignity and Rights: Treat Service Users with respect and dignity, upholding their rights to make informed decisions about their care and support.
- Promoting Safety: Take steps to prevent abuse, neglect, and exploitation by adhering to safe working practices, following risk assessments, and ensuring that Service Users are not subjected to any form of harm.
- Engaging in Training: Complete all required safeguarding training, which will be updated regularly to ensure that staff are knowledgeable and confident in recognizing and reporting safeguarding concerns.

Staff members must understand that safeguarding is part of their core responsibility and that the safety and well-being of Service Users are always paramount.

Relevant Regulations:

- Health and Social Care Act 2008 (Regulated Activities) Regulations 2014, Regulation 13
- Care Act 2014, CQC Fundamental Standards

7.4 Service User and Family/Advocate Involvement

Service Users, along with their families or advocates, play an essential role in safeguarding. Their responsibilities include:

- Reporting Concerns: Service Users and their families or advocates have the right to raise concerns about abuse, neglect, or exploitation. They should be encouraged and supported in doing so without fear of retaliation or harm.
- Participating in Safeguarding: Service Users are encouraged to actively engage in their safeguarding process, including participating in risk assessments and being consulted on decisions about their care and safety.
- Access to Advocacy: Service Users have access to independent advocates who can represent their views and support them in raising concerns, particularly in situations where communication or decision-making capacity may be limited.
- Promoting Awareness: Families and advocates should ensure that Service Users are informed about their rights and the steps they can take if they feel unsafe or abused.

Ensuring that Service Users and their families are actively involved in safeguarding processes is crucial for empowering individuals and ensuring their rights are upheld.

Relevant Regulations:

- Care Act 2014

- Health and Social Care Act 2008 (Regulated Activities) Regulations 2014, Regulation 13
- CQC Fundamental Standards

7.5 Human Resources and Recruitment Team

The Human Resources (HR) and Recruitment Team is responsible for ensuring that only suitable individuals are employed to work with Service Users. Their responsibilities include:

- Safe Recruitment Practices: Ensure that all staff undergo appropriate DBS checks, reference checks, and background screening before being employed by Primus Plus Healthcare, in line with the Safeguarding Vulnerable Groups Act 2006.
- Ensuring Staff Competency: Work with training teams to ensure that all new staff receive appropriate induction training in safeguarding and that ongoing professional development and safeguarding training are provided.
- Handling Allegations and Disciplinary Action: When safeguarding concerns arise, HR is responsible for ensuring that any necessary disciplinary actions are taken against staff members, up to and including dismissal if appropriate. Allegations are also referred to the appropriate authorities when necessary.

By ensuring safe recruitment and proper oversight, the HR team plays an integral role in safeguarding Service Users.

Relevant Regulations:

- Safeguarding Vulnerable Groups Act 2006
- Health and Social Care Act 2008 (Regulated Activities) Regulations 2014, Regulation 13
- CQC Fundamental Standards

7.6 External Agencies

In addition to internal roles, Primus Plus Healthcare works closely with external agencies to ensure safeguarding is effective. External agencies include:

- Local Safeguarding Adults Boards (LSABs): Provide multi-agency collaboration, ensuring that safeguarding practices meet local and national standards. Primus Plus Healthcare will cooperate with LSABs to address safeguarding concerns and improve practices.
- CQC: Regularly inspects services to ensure compliance with safeguarding regulations and will take action if standards are not met.
- Police and Local Authorities: When safeguarding concerns involve criminal activity or require investigation, Primus Plus Healthcare will involve the police and relevant local authority teams to ensure the safety of Service Users and to address the issue appropriately.

These external agencies support Primus Plus Healthcare by providing additional expertise, resources, and enforcement of legal requirements.

Relevant Regulations:

- Care Act 2014

- Health and Social Care Act 2008 (Regulated Activities) Regulations 2014, Regulation 13

8.0 DEFINITIONS OF ABUSE

In line with the Care Act 2014 and CQC Regulation 13 (Safeguarding Service Users from Abuse and Improper Treatment), Primus Plus Healthcare defines the various types of abuse that Service Users, particularly those with learning disabilities, mental health needs, and autism spectrum conditions, may experience. Understanding these forms of abuse is critical in preventing harm and ensuring that Service Users are protected from all forms of exploitation and mistreatment.

Each type of abuse has distinct signs and impacts on individuals, and it is essential that staff, volunteers, and contractors are aware of these forms of abuse to act swiftly and effectively.

8.1 Physical Abuse

Physical Abuse refers to the deliberate use of force, resulting in harm or injury to the individual. This type of abuse includes, but is not limited to:

- Slapping, hitting, or punching: Any form of physical aggression towards the individual.
- Kicking, biting, or scratching: Physical acts intended to cause pain or injury.
- Inappropriate use of restraint: The use of physical force to control an individual in a way that causes harm, distress, or violates their dignity. Restraint should only be used as a last resort, and only in accordance with the Mental Capacity Act 2005 and CQC Regulation 13.
- Force-feeding or other forms of physical coercion.

Impact: Physical abuse can cause immediate physical harm, injury, and pain. Over time, it may lead to psychological trauma, loss of trust, and fear of caregivers or others involved in the individual's care.

Relevant Legislation:

- Health and Social Care Act 2008 (Regulated Activities) Regulations 2014, Regulation 13
- Care Act 2014
- Mental Capacity Act 2005

8.2 Psychological/Emotional Abuse

Psychological or Emotional Abuse involves actions or threats that cause mental or emotional harm to the individual. Examples include:

- Intimidation, threats, or humiliation: Using words, gestures, or behaviours to instil fear or harm the individual emotionally.
- Verbal abuse: Insulting, belittling, or demeaning language intended to undermine the individual's sense of worth.
- Isolation or exclusion: Deliberately preventing the individual from participating in social, community, or family activities.
- Manipulation or coercion: Undue influence used to control the individual's actions or decisions.

Impact: Psychological abuse can lead to severe emotional distress, depression, anxiety, and a lack of confidence or self-worth. The effects can be long-lasting and, in some cases, more difficult to identify than physical abuse.

Relevant Legislation:

- Care Act 2014
- Health and Social Care Act 2008 (Regulated Activities) Regulations 2014, Regulation 13
- CQC Fundamental Standards (Safe)

8.3 Sexual Abuse

Sexual Abuse refers to any non-consensual sexual activity, where the individual is forced, coerced, or manipulated into engaging in sexual acts. This includes:

- Rape or sexual assault: Any form of unwanted or non-consensual sexual penetration.
- Sexual exploitation: Taking advantage of a vulnerable individual for sexual purposes, including manipulating or coercing someone into sexual acts.
- Inappropriate touching or sexual comments: Any act that violates the person's personal boundaries or dignity.
- Sexual harassment: Any unwelcome or inappropriate behavior of a sexual nature that causes distress or harm.

Impact: Sexual abuse can have profound physical, emotional, and psychological effects, including trauma, depression, anxiety, sexual dysfunction, and a loss of trust in others. It can lead to long-term mental health conditions such as post-traumatic stress disorder (PTSD).

Relevant Legislation:

- Sexual Offences Act 2003
- Care Act 2014
- Health and Social Care Act 2008 (Regulated Activities) Regulations 2014, Regulation 13
- CQC Fundamental Standards

8.4 Financial Abuse

Financial Abuse involves the illegal or improper use of an individual's financial resources. This includes:

- Theft, fraud, or misappropriation of funds: Taking money, property, or assets without consent.
- Undue influence over financial decisions: Coercing or manipulating an individual into handing over control of their finances.
- Exploitation of assets: Using a Service User's property or benefits without their permission for personal gain.
- Withholding money: Restricting access to funds that are needed for daily living, medical care, or other essential needs.

Impact: Financial abuse can lead to loss of financial security, exploitation, and distress. It can severely impact an individual's ability to live independently and manage their own finances, contributing to further vulnerability.

Relevant Legislation:

- Care Act 2014
- Fraud Act 2006
- Health and Social Care Act 2008 (Regulated Activities) Regulations 2014, Regulation 13
- CQC Fundamental Standards

8.5 Neglect

Neglect occurs when the basic needs of an individual are not met, and it involves the failure to provide adequate care and support. Examples include:

- Failure to provide adequate nutrition, hydration, or medical care: Not ensuring that the individual receives the necessary food, water, or healthcare treatment to maintain their well-being.
- Failure to assist with personal care: Not providing assistance with tasks such as bathing, dressing, or toileting when needed.
- Inadequate living conditions: Allowing Service Users to live in unsafe, unsanitary, or unsuitable conditions that affect their health and well-being.
- Failure to provide appropriate social or emotional support: Isolating the individual or not offering necessary emotional or mental health care.

Impact: Neglect can result in physical harm, health deterioration, emotional distress, and a loss of confidence. It can lead to preventable health problems and, in severe cases, long-term disability or death.

Relevant Legislation:

- Care Act 2014
- Health and Social Care Act 2008 (Regulated Activities) Regulations 2014, Regulation 13
- CQC Fundamental Standards

8.6 Discriminatory Abuse

Discriminatory Abuse refers to abuse based on the individual's race, gender, disability, age, sexual orientation, or other protected characteristics. Examples include:

- Exclusion from services: Denying access to care, services, or opportunities based on discriminatory factors such as race, age, or disability.
- Harassment or unfair treatment: Treating individuals unfairly or with prejudice due to their personal characteristics.
- Verbal abuse or bullying: Using derogatory language or making offensive remarks about an individual's race, gender, disability, or other protected characteristics.

Impact: Discriminatory abuse causes harm to the individual's self-esteem, dignity, and emotional well-being. It can lead to mental health issues, isolation, and a diminished quality of life.

Relevant Legislation:

- Equality Act 2010
- Care Act 2014
- Health and Social Care Act 2008 (Regulated Activities) Regulations 2014, Regulation 13
- CQC Fundamental Standards

8.7 Modern Slavery

Modern Slavery involves the exploitation of individuals for labour or sexual exploitation through force, fraud, or coercion. This includes:

- Human trafficking: The illegal transportation and exploitation of individuals for forced labour or sexual exploitation.
- Forced labour: Requiring individuals to work under threat, coercion, or deceit, often under inhumane conditions.
- Sexual exploitation: Exploiting individuals for commercial sexual purposes.

Impact: Modern slavery causes severe psychological and physical harm, including trauma, mental health issues, and physical injuries. Victims may suffer long-lasting emotional distress and may have difficulty reintegrating into society.

Relevant Legislation:

- Modern Slavery Act 2015
- Care Act 2014
- Health and Social Care Act 2008 (Regulated Activities) Regulations 2014, Regulation 13
- CQC Fundamental Standards.

9.0 PREVENTION OF ABUSE

Primus Plus Healthcare is committed to preventing abuse, neglect, and exploitation of Service Users in all aspects of care. Preventing abuse requires a proactive, holistic approach that incorporates education, training, risk management, and continuous monitoring. This section outlines the measures Primus Plus Healthcare will take to prevent abuse, ensure the safety of Service Users, and meet regulatory requirements set by the Care Quality Commission (CQC), Care Act 2014, and other relevant legislation.

9.1 Staff Training and Development

Primus Plus Healthcare recognizes that the prevention of abuse begins with ensuring that all staff, volunteers, and contractors are adequately trained and knowledgeable about safeguarding procedures. The Registered Manager and Designated Safeguarding Lead (DSL) will ensure that:

- Comprehensive Safeguarding Training: All staff, volunteers, and contractors will undergo thorough training that includes:

- Types of Abuse: Understanding the different types of abuse (physical, psychological, sexual, financial, etc.), the signs and symptoms, and the impact on Service Users.
- Safeguarding Procedures: Clear guidance on reporting concerns, escalating issues to relevant authorities (e.g., CQC, Local Authority Safeguarding Teams), and responding to safeguarding concerns.
- Person-Centered Care: Staff will be trained to respect the Service Users' autonomy, dignity, and preferences while maintaining a safe environment free from abuse.
- Legal Requirements: Training on relevant safeguarding legislation, including the Care Act 2014, Health and Social Care Act 2008, CQC Fundamental Standards, and Mental Capacity Act 2005.
- Dealing with Difficult Situations: Guidance on how to manage challenging behaviours, including how to reduce the risk of situations escalating into abuse or neglect.

Relevant Regulations:

- Health and Social Care Act 2008 (Regulated Activities) Regulations 2014, Regulation 13
- Care Act 2014
- CQC Fundamental Standards

9.2 Safe Recruitment and Screening

Preventing abuse begins with ensuring that only individuals who are safe, competent, and suitable to work with Service Users are employed. Primus Plus Healthcare is committed to implementing a comprehensive recruitment and screening process that complies with all relevant regulations, safeguards Service Users, and maintains a high standard of care. This section outlines the steps taken to ensure that staff, volunteers, and contractors meet safeguarding standards.

9.2.1 Conduct Robust Recruitment Checks

To prevent abuse and ensure that only suitable individuals work with Service Users**,** Primus Plus Healthcare will conduct a thorough recruitment process for all staff, volunteers, and contractors. The recruitment checks include:

- Enhanced DBS Checks: As a requirement under the Safeguarding Vulnerable Groups Act 2006, all staff, volunteers, and contractors will undergo an Enhanced Disclosure and Barring Service (DBS) check. This ensures that individuals with a history of abusive behavior or unsuitable conduct are identified and barred from working with vulnerable adults. The DBS check helps to safeguard against individuals who may pose a risk to **Service Users** by confirming that they are not listed on the DBS barring lists for vulnerable groups.
- Reference Checks: Prior employment references will be thoroughly checked to verify that individuals have the necessary experience, integrity, and ethical standards to work with vulnerable adults. Reference checks will include:
    - Contacting previous employers or organizations where the individual has worked.

- Verifying that the applicant has not been previously involved in any safeguarding concerns or incidents of abuse.
- Seeking confirmation from previous employers regarding the suitability of the individual for working with vulnerable adults.

- Right to Work Checks**:** As part of the recruitment process, Primus Plus Healthcare will verify that all staff members are legally eligible to work in the UK, in accordance with immigration law. This includes checking that employees have the appropriate visa or work authorization, ensuring compliance with UK Border Agency regulations.

These checks ensure that Primus Plus Healthcare hires only individuals who meet the organization's ethical and legal standards, safeguarding Service Users from potential harm.

Relevant Regulations**:**

- Safeguarding Vulnerable Groups Act 2006
- Health and Social Care Act 2008 (Regulated Activities) Regulations 2014, Regulation 13 (Safeguarding Service Users from Abuse and Improper Treatment)
- CQC Fundamental Standards
- Immigration, Asylum, and Nationality Act 2006 (Right to Work)

9.2.2 Vetting Process for Contractors

External contractors, including those involved in maintenance, agency workers, or other service providers, will also undergo thorough background checks to ensure they meet Primus Plus Healthcare's safeguarding standards. This includes:

- Background Screening**:** Contractors will be subject to Enhanced DBS checks and reference checks, particularly if their role involves direct interaction with Service Users or access to personal or sensitive information.
- Compliance with Safeguarding Standards**:** Primus Plus Healthcare ensures that contractors are aware of the organization's safeguarding policies and adhere to these standards during their engagement. Contracts with external providers will include clauses that require adherence to safeguarding policies and reporting requirements.
- Supervision and Monitoring: Contractors working within the premises will be monitored to ensure compliance with safeguarding policies. They will be required to report any concerns regarding Service Users to the Designated Safeguarding Lead (DSL) or other relevant parties.

By vetting external contractors, Primus Plus Healthcare ensures that all individuals working within the organization, regardless of their employment status, adhere to the same high standards of safeguarding and contribute to a safe environment for **Service Users**.

Relevant Regulations**:**

- Safeguarding Vulnerable Groups Act 2006
- Health and Social Care Act 2008 (Regulated Activities) Regulations 2014**,** Regulation 13
- CQC Fundamental Standards

9.2.3 Ongoing Monitoring and Supervision

To ensure that all staff and contractors continue to meet safeguarding standards throughout their employment, Primus Plus Healthcare will implement a system of ongoing monitoring and supervision. This includes:

- Regular Supervision and Appraisals: All staff members will undergo regular supervision and performance appraisals to review their conduct, effectiveness, and compliance with safeguarding procedures. This ensures that staff remain fit to perform their roles and are continuously supported to deliver high-quality care.
- Continual Professional Development (CPD)**:** Staff will participate **in** ongoing training and development programs to stay updated on safeguarding best practices, relevant legislation, and emerging risks. This includes mandatory refresher courses on safeguarding, mental capacity, and recognizing and responding to abuse.
- Spot Checks and Audits**:** Primus Plus Healthcare will carry out random audits and spot checks of staff and contractors' work to ensure adherence to safeguarding policies and procedures.

Relevant Regulations**:**

- Health and Social Care Act 2008 (Regulated Activities) Regulations 2014**,** Regulation 18 (Staffing)
- CQC Fundamental Standards
- Care Act 2014

9.2.4 Ensuring a Safe Working Environment

Primus Plus Healthcare is committed to maintaining a safe working environment that promotes the well-being of both staff and Service Users. This includes:

- Safe Workplace Practices: Ensuring that all areas where staff interact with Service Users are free from hazards, with clear protocols in place for maintaining safety and preventing incidents that could lead to abuse.
- Supportive Culture: Promoting a culture of respect, professionalism, and accountability among all staff members. Encouraging staff to speak up and raise concerns about any safeguarding issues they witness or experience.

Relevant Regulations**:**

- Health and Social Care Act 2008 (Regulated Activities) Regulations 2014**,** Regulation 12 (Safe Care and Treatment)
- CQC Fundamental Standards

9.3 Risk Assessments and Environmental Safety

Primus Plus Healthcare will conduct regular risk assessments to identify potential areas where abuse could occur and take appropriate steps to mitigate these risks. This includes:

- Individual Risk Assessments: All Service Users will have a tailored risk assessment to identify any vulnerabilities or potential risks related to abuse, neglect, or exploitation. These assessments will consider factors such as mental health, communication barriers, cognitive impairments, and any history of abuse.
- Environmental Risk Assessments: The physical environment in which Service Users live will be assessed to ensure it is safe and secure. This includes ensuring that:

    - Accessible and safe living conditions: The environment is free from hazards, both physical (e.g., unsafe equipment, inadequate lighting) and social (e.g., isolating practices, inappropriate staff interactions).
    - Staffing levels: Ensuring there are sufficient staff to meet the needs of Service Users, minimizing the risk of staff burnout or neglect, which could lead to abusive situations.
- Monitoring and Review: Risk assessments will be reviewed regularly and updated as necessary, ensuring that changing needs and circumstances are addressed promptly.

Relevant Regulations:

- Care Act 2014
- Health and Social Care Act 2008 (Regulated Activities) Regulations 2014, Regulation 12 (Safe Care and Treatment)
- CQC Fundamental Standards

9.4 Promoting Open Communication

A culture of openness and transparency is essential to preventing abuse. Primus Plus Healthcare will:

- Encourage Reporting: All staff, volunteers, and contractors will be encouraged to report any safeguarding concerns without fear of retaliation or discrimination. This is supported by a robust whistleblowing policy.
- Service User Involvement: Service Users will be supported to speak up about any concerns they may have about their care or treatment, and be given the tools and support to do so, including access to independent advocacy.
- Family and Advocate Engagement: Families and advocates will be encouraged to be active participants in the safeguarding process, providing support and oversight to Service Users and ensuring they are safe and treated with respect.

Relevant Regulations:

- Health and Social Care Act 2008 (Regulated Activities) Regulations 2014, Regulation 18 (Staffing)
- CQC Fundamental Standards
- Public Interest Disclosure Act 1998 (Whistleblowing)

9.5 Clear Safeguarding Reporting Procedures

To ensure that safeguarding concerns are promptly identified, reported, and addressed, Primus Plus Healthcare is committed to implementing clear, transparent, and accessible reporting procedures for staff, Service Users, families, and external partners. These procedures ensure that concerns are acted upon swiftly, investigated thoroughly, and escalated when necessary to protect the safety and well-being of Service Users**.**

9.5.1 Safeguarding Lead Contact

At Primus Plus Healthcare, the Designated Safeguarding Lead (DSL) is the key point of contact for all safeguarding concerns. Clear contact details for the DSL are made readily available to staff, Service Users, families, and external partners to ensure that safeguarding concerns can be reported without delay.

- **Designated Safeguarding Lead (DSL)**:

  The DSL is responsible for overseeing the safeguarding process, ensuring concerns are promptly addressed, and coordinating with external agencies when necessary.

- **Contact Details**:
  - Name**:** Jonas Ayitevie (Designated Safeguarding Lead)
  - Phone: +44 7359 402911
  - Email**:** care@primusplus.co.uk
  - Address: 603 London Road, Westcliff on Sea, Southend on Sea, Essex, SS0 9PE

Relevant Regulations**:**

- Health and Social Care Act 2008 (Regulated Activities) Regulations 2014, Regulation 13 (Safeguarding Service Users from Abuse and Improper Treatment)
- Care Act 2014**,** Section 42 (Duty of Local Authorities to make inquiries)
- CQC Fundamental Standards

9.5.2 Immediate Action in Case of Suspected Abuse

In situations where abuse or neglect is suspected or identified, Primus Plus Healthcare ensures that staff act immediately to remove the Service User from harm and protect their safety.

- Immediate Removal from Potential Harm: If abuse is suspected or witnessed, Service Users will be immediately removed from the situation where they are at risk. This may involve relocating the Service User to a safe environment, ensuring that no further harm occurs.
- Prompt Notification and Action: Staff will immediately notify the Designated Safeguarding Lead (DSL) or, if unavailable, another senior staff member to begin the safeguarding process. The DSL will take the lead in coordinating the response, ensuring that the appropriate actions are taken in accordance with the organization's safeguarding procedures.
- Emergency Services: In cases of immediate risk of physical harm or life-threatening situations, staff will contact emergency services (999)**,** including the police, medical professionals, or paramedics, as needed. The safety of the Service User is the highest priority.

Relevant Regulations**:**

- Health and Social Care Act 2008 (Regulated Activities) Regulations 2014**,** Regulation 13 (Safeguarding Service Users from Abuse and Improper Treatment)
- Care Act 2014**,** Section 42
- CQC Fundamental Standards

9.5.3 Escalation Procedures

If safeguarding concerns cannot be resolved at the initial level, they will be escalated to the appropriate authorities to ensure that a thorough investigation takes place and that further harm is prevented. Primus Plus Healthcare has established clear escalation procedures that include:

- **Internal Escalation**:

  If a concern cannot be addressed by the DSL or immediate action is not effective, the issue will be escalated to the senior management team. The Registered Manager and Nominated Individual will review the situation, ensuring appropriate measures are taken to protect the Service User and address the concern.

- **External Agencies**:

  If the situation warrants further investigation or involves criminal activity, the concern will be escalated to external authorities. This includes:

  - CQC (Care Quality Commission)**:** Primus Plus Healthcare will report significant safeguarding concerns to CQC as required by Regulation 13 of the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014.
  - Local Authority Safeguarding Adults Team**:** Safeguarding concerns that meet the criteria for a formal enquiry under Section 42 of the Care Act 2014 will be reported to the Local Authority Safeguarding Adults Team for investigation.
  - Police**:** If the safeguarding concern involves criminal activity (e.g., physical or sexual abuse, financial exploitation), the police will be contacted immediately. Primus Plus Healthcare will fully cooperate with law enforcement to ensure that appropriate legal actions are taken.
  - Disclosure and Barring Service (DBS)**:** If an allegation involves a staff member, Primus Plus Healthcare will refer the individual to the DBS to ensure that they are barred from working with vulnerable adults.

Relevant Regulations**:**

- Health and Social Care Act 2008 (Regulated Activities) Regulations 2014**,** Regulation 13 (Safeguarding Service Users from Abuse and Improper Treatment)
- Care Act 2014**,** Section 42 (Duty of Local Authorities to make inquiries)
- CQC Fundamental Standards
- Safeguarding Vulnerable Groups Act 2006
- Police and Criminal Evidence Act 1984

9.54 Role of External Agencies in Safeguarding

Primus Plus Healthcare works closely with a range of external agencies to ensure that safeguarding concerns are managed effectively and Service Users are protected from harm. The relevant external agencies and their contact details are as follows:

- Care Quality Commission (CQC)**:**

  The CQC regulates health and social care services and will be notified of significant safeguarding concerns that impact service quality or indicate non-compliance with regulatory standards.

  - **Phone**: 03000 616161
  - **Email**: enquiries@cqc.org.uk
  - **Website**: www.cqc.org.uk

- **Local Authority Safeguarding Adults Team**:

  The Local Authority Safeguarding Adults Team is responsible for investigating allegations of abuse and neglect. Primus Plus Healthcare will report any concern that falls under Section 42 of the Care Act 2014, requiring a formal safeguarding enquiry.

  - **Example**:
    - **Phone**: 01702 215000
    - **Email**: safeguardingadults@southend.gov.uk
    - **Website**: www.southend.gov.uk
- **Disclosure and Barring Service (DBS)**:

  If an allegation involves staff misconduct or abuse, Primus Plus Healthcare will report the individual to the DBS for further investigation and potential barring from working with vulnerable adults.

  - **Phone**: 01325 953 795
  - **Website**: www.gov.uk/dbs
- **Police**:
  If a safeguarding concern involves criminal behavior or immediate harm, the police will be contacted. Primus Plus Healthcare will collaborate with law enforcement to investigate and address the issue.
  - Emergency: 999
  - Non-Emergency: 101

9.55 Follow-Up Actions

After responding to a safeguarding concern, Primus Plus Healthcare will ensure that follow-up actions are taken to prevent further incidents and to learn from any safeguarding issues that arise. This includes:

- Reviewing and Updating Safeguarding Policies: The safeguarding policy will be reviewed regularly to incorporate new legislation, feedback from **Service Users**, and lessons learned from safeguarding incidents.
- Feedback from Service Users and Families**:** Collecting feedback from **Service Users** and families to ensure that safeguarding practices meet their needs and expectations.
- Ongoing Monitoring**:** Primus Plus Healthcare will monitor the effectiveness of safeguarding measures and continuously assess risks to ensure that **Service Users** are not exposed to abuse or neglect in the future.

Relevant Regulations**:**

- CQC Fundamental Standards
- Health and Social Care Act 2008 (Regulated Activities) Regulations 2014**,** Regulation 13
- Care Act 2014
- CQC Key Lines of Enquiry (KLOEs)

9.6 Dealing with Allegations Against Staff

Primus Plus Healthcare recognizes the importance of promptly addressing any allegations of abuse, misconduct, or improper treatment made against staff members. Ensuring that allegations are managed fairly and thoroughly protects Service Users, supports staff members involved, and upholds the integrity of the organization.

This policy outlines the steps to be taken when an allegation is made against a staff member, ensuring that all actions align with CQC regulations**,** employment law, and safeguarding principles.

9.6.1 Immediate Suspension or Reassignment

When an allegation of abuse or misconduct is made against a staff member, Primus Plus Healthcare will take immediate action to protect Service Users and maintain a safe environment.

- Immediate Suspension: The accused staff member will be immediately suspended from their duties to ensure the safety of Service Users while an investigation is conducted. Suspension is a precautionary measure and does not imply guilt.
- Reassignment to Non-Care Duties: In cases where suspension is not necessary, the staff member may be reassigned to non-care duties, ensuring that they do not have contact with Service Users while the investigation is underway.

The immediate suspension or reassignment ensures that the safeguarding of Service Users is the top priority and that staff who are under investigation do not have access to vulnerable individuals during the investigation process.

Relevant Regulations**:**

- Health and Social Care Act 2008 (Regulated Activities) Regulations 2014**,** Regulation 13 (Safeguarding Service Users from Abuse and Improper Treatment)
- Care Act 2014**,** Section 42 (Duty of Local Authorities to make inquiries)
- CQC Fundamental Standards

9.6.2 Investigation of Allegations

Once an allegation has been made, Primus Plus Healthcare will ensure that it is thoroughly investigated in a fair, impartial, and transparent manner. The investigation will adhere to the following steps:

- Fair and Impartial Investigation: The investigation will be conducted by senior management or a designated independent party, ensuring no bias or conflict of interest. All parties involved, including the Service User, the accused staff member, and any witnesses, will be interviewed in a fair and unbiased manner.
- Confidentiality and Sensitivity: Throughout the investigation, confidentiality will be maintained to protect the privacy of all individuals involved, including the Service User and the accused staff member. Only individuals who need to be involved in the investigation will be informed of the situation.
- External Agencies Involvement: If the investigation suggests that criminal behavior or serious misconduct has occurred, Primus Plus Healthcare will involve external agencies such as:

- The Police: If the allegation involves criminal activity (e.g., physical assault, sexual abuse, financial exploitation), the police will be contacted immediately to investigate the matter further.
- CQC**:** If the allegation relates to systemic issues, neglect, or non-compliance with CQC regulations, the CQC will be informed in accordance with Regulation 13 of the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014**.**
- Local Authority Safeguarding Adults Team: In cases where the allegation involves significant abuse or neglect, the Local Authority Safeguarding Adults Team will be notified, as per Section 42 of the Care Act 2014, to conduct further enquiries.

Relevant Regulations**:**

- Health and Social Care Act 2008 (Regulated Activities) Regulations 2014**,** Regulation 13 (Safeguarding Service Users from Abuse and Improper Treatment)
- Care Act 2014**,** Section 42
- CQC Fundamental Standards
- Safeguarding Vulnerable Groups Act 2006 (DBS referrals)

9.6.3 Disciplinary Action

If the investigation into the safeguarding concern substantiates the allegation, Primus Plus Healthcare will take appropriate disciplinary action in accordance with employment law and the organization's policies. This may include:

- Dismissal**:** If the allegation is confirmed, and it is found that the staff member's actions breached safeguarding policies or posed a risk to Service Users, they may be dismissed from their role. This ensures that Primus Plus Healthcare maintains high standards of care and protects Service Users from harm.
- Referral to the Disclosure and Barring Service (DBS): If the staff member's actions indicate that they pose a risk to vulnerable adults, Primus Plus Healthcare will refer them to the DBS. The DBS will assess whether the individual should be barred from working with vulnerable adults in the future, in accordance with the Safeguarding Vulnerable Groups Act 2006**.**
- Professional Regulatory Bodies: If the accused staff member is registered with a professional body (e.g., Nursing and Midwifery Council (NMC) **or** Health and Care Professions Council (HCPC)**),** Primus Plus Healthcare will notify the relevant professional body. This ensures that the individual's professional conduct is reviewed, and any necessary action is taken to protect Service Users.
- Rehabilitation and Retraining: In cases where the misconduct is not severe enough to warrant dismissal, Primus Plus Healthcare may require the individual to undergo further training or rehabilitation programs before returning to their role. However, the safety of Service Users will always be the primary consideration in any decision-making.

Relevant Regulations**:**

- Health and Social Care Act 2008 (Regulated Activities) Regulations 2014**,** Regulation 13
- Safeguarding Vulnerable Groups Act 2006 (DBS referrals)

- Care Act 2014
- CQC Fundamental Standards
- Employment Law (Fair Disciplinary Procedures)

9.7 Regular Audits and Safeguarding Reviews

To ensure that safeguarding procedures are effective and up-to-date, Primus Plus Healthcare will:

- Conduct Regular Audits: Safeguarding audits will be conducted periodically to assess the effectiveness of safeguarding measures and identify areas for improvement.
- Review Policies and Procedures: The safeguarding policy will be reviewed and updated regularly to reflect changes in legislation, feedback from Service Users and staff, and lessons learned from any safeguarding incidents.

Relevant Regulations:

- CQC Fundamental Standards
- Health and Social Care Act 2008 (Regulated Activities) Regulations 2014, Regulation 13
- Care Act 2014

10.0 REPORTING AND RESPONDING TO SAFEGUARDING CONCERNS

Primus Plus Healthcare is committed to ensuring that safeguarding concerns are reported and addressed in a timely, thorough, and legally compliant manner. This section outlines the procedures for reporting and responding to safeguarding concerns, ensuring that all Service Users are protected and any allegations of abuse, neglect, or exploitation are handled with the utmost seriousness.

Primus Plus Healthcare understands the importance of involving the appropriate external contacts when responding to safeguarding concerns, in line with CQC regulations, the Care Act 2014, and other relevant legislation.

10.1 Reporting Safeguarding Concerns

Safeguarding concerns can be reported by staff, Service Users, their families, or external agencies. It is critical that concerns are reported promptly to prevent harm and ensure the safety of the Service User.

- Clear Reporting Channels: All staff, volunteers, and contractors are trained to report any safeguarding concern to the Designated Safeguarding Lead (DSL) or designated safeguarding contact immediately.
- Accessible Reporting Mechanisms: Reporting procedures are made accessible to all Service Users, families, and stakeholders, including those with communication challenges. Reports can be made through phone, email, or in writing to ensure accessibility for all.
- Whistleblowing: Staff are encouraged to report any concerns via the whistleblowing policy, ensuring that there is no fear of retaliation for reporting safeguarding issues.

- Immediate Action: In cases where a concern poses an immediate risk to a Service User's safety, staff will take immediate action to safeguard the individual and report the concern to external agencies as appropriate.

Relevant Regulations:

- Health and Social Care Act 2008 (Regulated Activities) Regulations 2014, Regulation 13 (Safeguarding Service Users from Abuse and Improper Treatment)
- Care Act 2014, Section 42 (Duty of Local Authorities to make inquiries)
- CQC Fundamental Standards
- Public Interest Disclosure Act 1998 (Whistleblowing)

10.2 Responding to Safeguarding Concerns

Once a safeguarding concern has been raised, Primus Plus Healthcare follows a clear procedure to investigate and respond. The first priority is always the safety and well-being of the **Service** User.

- Immediate Action: If there is a risk of ongoing harm, immediate protective action will be taken to ensure the Service User is safe and removed from the potentially harmful situation.
- Investigation: A full investigation into the concern will be conducted promptly, ensuring fairness, transparency, and thoroughness. The Designated Safeguarding Lead (DSL) will coordinate the investigation, ensuring that any findings are recorded accurately and actions are taken.
- Documentation: All safeguarding concerns and investigations will be documented in line with CQC and GDPR requirements. A clear record will be kept of the actions taken, including reports to external agencies and any subsequent outcomes.

Relevant Regulations:

- Health and Social Care Act 2008 (Regulated Activities) Regulations 2014, Regulation 13 (Safeguarding Service Users from Abuse and Improper Treatment)
- Care Act 2014, Section 42
- CQC Fundamental Standards

10.3 External Agencies and Reporting

In accordance with CQC regulations and other safeguarding requirements, Primus Plus Healthcare will work closely with a range of external agencies to ensure that safeguarding concerns are managed effectively. These agencies provide the necessary support, expertise, and authority required to investigate, manage, and resolve concerns. The following is a comprehensive list of external agencies that Primus Plus Healthcare may contact and collaborate with in the event of a safeguarding concern.

10.3.1 Care Quality Commission (CQC)

The Care Quality Commission (CQC) is the regulator for health and social care services in England. Primus Plus Healthcare is required to report any safeguarding concerns, particularly those that involve systemic issues or breaches of CQC regulations, including Regulation 13 (Safeguarding Service Users from Abuse and Improper Treatment).

When a safeguarding concern involves poor practices, non-compliance with CQC standards, or when serious abuse or neglect is suspected, Primus Plus Healthcare will report the concern to CQC for further investigation.

Key Responsibilities of CQC:

- Inspect and regulate health and social care services.
- Monitor and ensure that services comply with CQC Fundamental Standards, including safeguarding practices.
- Take regulatory action if standards are not met or if abuse or neglect is identified.

Contact Details for CQC:

- **Phone**: 03000 616161
- **Email**: enquiries@cqc.org.uk
- **Website**: www.cqc.org.uk

If Primus Plus Healthcare is notified of or suspects any regulatory breaches, concerns related to the safety of Service Users, or ongoing abuse or neglect, the CQC will be contacted immediately.

10.3.2 Local Authority Safeguarding Adults Team

Local authorities are responsible for investigating safeguarding concerns that involve vulnerable adults under the Care Act 2014**.** Primus Plus Healthcare will refer any safeguarding concerns that meet the threshold for a formal safeguarding enquiry to the relevant Local Authority Safeguarding Adults Team**.**

Key Responsibilities of Local Authority Safeguarding Teams**:**

- Investigation**:** Safeguarding Adults Teams are tasked with investigating allegations of abuse or neglect. They have the authority to make safeguarding enquiries under Section 42 of the Care Act 2014.
- Risk Assessment and Support: They will assess the risk to Service Users and ensure that appropriate support is in place to protect them from further harm.
- Coordinating Multi-Agency Responses: Local authorities work in collaboration with other agencies, such as the police**,** healthcare providers, and CQC, to ensure a coordinated response to safeguarding concerns.

Contact Details for Local Authority Safeguarding Adults Team:

- Southend-on-Sea Safeguarding Adults Team
    - **Phone**: 01702 215000
    - **Email**: safeguardingadults@southend.gov.uk
    - **Website**: www.southend.gov.uk

If a concern involves a Service User who is at risk of abuse, neglect, or exploitation, Primus Plus Healthcare will contact the local authority's safeguarding team, ensuring compliance with the Care Act 2014 and safeguarding best practices.

10.3.4 Police

If a safeguarding concern involves criminal behavior, such as physical assault, sexual abuse, fraud, or any other criminal activity, Primus Plus Healthcare will immediately involve the

police**.** Safeguarding concerns that involve potential criminal activity should be escalated to the appropriate law enforcement agency to ensure that a thorough investigation takes place and that justice is served.

Key Responsibilities of the Police**:**

- Investigating Criminal Activity: The police will investigate any concerns that involve criminal behavior, such as abuse, assault, theft, or fraud.
- Gathering Evidence: The police will gather evidence and witness testimony, and may take action through the criminal justice system.
- Protecting the Victim: The police will ensure that the Service User is safe from further harm and will assist in any necessary legal proceedings.

Contact Details for Police:

- Emergency**:** 999
- Non-Emergency: 101

10.3.5 Independent Advocacy Services

Primus Plus Healthcare ensures that Service Users who are involved in safeguarding concerns are supported by independent advocacy services. Advocacy ensures that the Service User's voice is heard and that they are fully informed throughout the safeguarding process.

Key Responsibilities of Advocacy Services:

- Supporting Service Users: Advocacy services provide support in making decisions, understanding their rights, and ensuring that they are fully informed during the safeguarding process.
- Independent Representation: Advocacy services ensure that Service Users are represented independently and that their views are communicated clearly to those involved in the safeguarding process.

Contact Details for Advocacy Services:

- **Southend Advocacy Service**
  - **Phone**: 01702 340 042
  - **Address:**

    Southend Advocacy Service

    3rd Floor, The Forum,

    Elmer Square, Southend-on-Sea,

    Essex, SS1 1NS

10.4 Follow-Up Actions and Continuous Improvement

After addressing a safeguarding concern, Primus Plus Healthcare will ensure that follow-up actions are taken to prevent further incidents. This includes:

- Reviewing Safeguarding Practices: Safeguarding policies and procedures will be regularly reviewed and updated to reflect the latest best practices, feedback from Service Users, and lessons learned from incidents.

- Staff Support and Debriefing: Staff involved in the safeguarding process will be supported through debriefing sessions to ensure they are equipped to handle future concerns and maintain their well-being.
- Ongoing Monitoring: Continuous monitoring of care practices and feedback from Service Users will ensure that any emerging risks are identified and addressed early.

Relevant Regulations:

- CQC Fundamental Standards
- Care Act 2014
- Health and Social Care Act 2008 (Regulated Activities) Regulations 2014, Regulation 13

11.0 LOCAL AUTHORITY SUPPORT

At Primus Plus Healthcare, safeguarding is never managed in isolation. Protecting adults at risk requires strong, open, and professional partnerships. We work closely with our Local Authority Safeguarding Adults Team to ensure every Service User is protected, listened to, and supported particularly adults with:

- Learning disabilities
- Autism spectrum conditions
- Mental health needs

We recognise that individuals receiving supported living without personal care may still experience vulnerability due to social isolation, cognitive differences, mental health fluctuations, financial dependency, or exploitation risks.

Under Section 42 of the Care Act 2014, the Local Authority has a statutory duty to make safeguarding enquiries where an adult:

- Has care and support needs (whether or not those needs are currently being met),
- Is experiencing, or is at risk of, abuse or neglect, and
- Is unable to protect themselves because of those needs.

Southend-on-Sea Safeguarding Adults Team

Because Primus Plus Healthcare operates in Southend-on-Sea, Essex, we work directly with:

Southend-on-Sea Safeguarding Adults Team

This team is responsible for:

- Receiving and assessing safeguarding referrals
- Undertaking or coordinating safeguarding enquiries under the Care Act 2014
- Working alongside police, NHS services, housing providers, and care organisations
- Supporting adults at risk to achieve outcomes that reflect their wishes and views
- Coordinating multi-agency safeguarding responses
- Conducting Safeguarding Adults Reviews (SARs) where required

The team operates under the oversight of the Southend Safeguarding Adults Board (SSAB)**,** which ensures safeguarding arrangements are effective across the region in line with national statutory guidance.

11.1 How to Contact the Local Authority Safeguarding Adults Team

Southend-on-Sea Safeguarding Adults Team

Adult Social Care (Main Contact): 01702 215008

Email: safeguardingadults@southend.gov.uk

Website: www.southend.gov.uk

Address:
Southend-on-Sea City Council

Civic Centre

Victoria Avenue

Southend-on-Sea
SS2 6ER

Out of Hours Emergency Social Care: 0345 606 1212

If there is immediate danger or a crime has been committed**:** 999 (Emergency Services)

Police (Non-Emergency): 101

These contact details are displayed within the service and included in staff safeguarding training to ensure immediate access when required, in line with CQC guidance

Safeguarding policy and procedure

.**11.2 How Primus Plus Healthcare Works with the Local Authority**

In accordance with:

- Care Act 2014
- Health and Social Care Act 2008 (Regulated Activities) Regulations 2014 – Regulation 13
- CQC Fundamental Standards
- CQC Key Lines of Enquiry (Safe & Well-Led)

Primus Plus Healthcare will:

Make Prompt Referrals

Report safeguarding concerns to the Local Authority without delay where the Section 42 threshold is met.

Cooperate Fully with Enquiries

Work transparently and professionally with safeguarding officers and partner agencies.

Share Information Lawfully

Share relevant information appropriately in line with:

- Data Protection Act 2018

- UK GDPR
- Information Sharing Guidance under the Care Act 2014

Attend Safeguarding Meetings

Participate in:

- Strategy discussions
- Safeguarding planning meetings
- Case conferences
- Multi-agency reviews

Support Service User Participation

Ensure Service Users are:

- Informed about the safeguarding process
- Supported to express their wishes
- Offered independent advocacy where required

Focus on Outcomes

Ensure safeguarding actions reflect:

- The Service User's wishes
- Their safety
- Their independence
- The least restrictive approach (in line with the Mental Capacity Act 2005)

11.3 Supporting Service Users During Local Authority Involvement

We understand that safeguarding investigations can feel stressful or confusing — particularly for adults with:

- Learning disabilities
- Autism spectrum conditions
- Communication differences
- Mental health challenges

As a supported living provider without personal care, we recognise the importance of reassurance, clarity, and dignity during safeguarding processes.

Therefore, Primus Plus Healthcare will:

- Explain safeguarding processes in clear, accessible language
- Provide easy-read formats and visual aids
- Offer access to independent advocacy services
- Allow additional time for communication where needed
- Provide emotional reassurance and consistent support
- Respect confidentiality and privacy

Safeguarding is not just about protection it is about empowerment, dignity, autonomy, and maintaining independence in supported living.

11.4 Accessibility for Autistic People and People with Learning Disabilities

In line with CQC guidance for specialist services

Safeguarding policy and procedure

Primus Plus Healthcare ensures that:

- Safeguarding information is available in accessible formats
- Staff receive autism-aware and learning disability-informed training
- Communication adjustments are made (e.g., visual timetables, simplified language)
- Sensory sensitivities are considered during meetings or investigations
- Advocacy is offered where capacity or confidence is affected

This ensures Service Users can genuinely understand, access, and use this safeguarding policy.

11.5 Our Commitment

Primus Plus Healthcare maintains a strong, transparent, and collaborative relationship with the Southend-on-Sea Local Authority to ensure that:

- Safeguarding concerns are taken seriously
- Service Users remain safe in supported living without personal care
- Concerns are escalated appropriately and promptly
- Outcomes are person-centred
- All regulatory duties under the Care Act 2014 and CQC Regulation 13 are fully met

12.0 SUPPORT FOR VICTIMS

At Primus Plus Healthcare, safeguarding does not end when a concern is reported. Our responsibility continues through ensuring that any Service User who has experienced abuse, neglect, exploitation, or harm receives the right protection, care, reassurance, and support.

We understand that abuse can have lasting emotional, psychological, and practical impacts — particularly for adults with:

- Learning disabilities
- Autism spectrum conditions
- Mental health needs

In line with:

- Care Act 2014 (Section 42 & Wellbeing Principle)
- Health and Social Care Act 2008 (Regulated Activities) Regulations 2014 – Regulation 13
- CQC Fundamental Standards

- Mental Capacity Act 2005
- Human Rights Act 1998

Primus Plus Healthcare is committed to ensuring victims are treated with dignity, compassion, and respect.

Safeguarding is not only about protection it is about recovery, empowerment, and restoring confidence.

12.1 Immediate Protection

The first priority is always safety.

Where abuse is suspected or confirmed, Primus Plus Healthcare will take immediate action to protect the adult at risk. This may include:

Removing the Risk

- Separating the Service User from the alleged perpetrator
- Suspending or reassigning staff if necessary
- Arranging alternative safe accommodation if required
- Contacting emergency services (999) where there is immediate danger

Medical Support

- Arranging urgent medical assessment where injuries or trauma are suspected
- Supporting attendance at GP, hospital, or sexual assault referral centres (SARCs) where appropriate

Emotional Reassurance

- Providing calm, clear reassurance
- Ensuring the Service User is not left feeling isolated or blamed
- Supporting them in a familiar and safe environment

Protecting Evidence (if criminal offence suspected)

- Avoiding contamination of evidence
- Following police guidance where necessary

These actions align with:

- Care Act 2014 – Duty to Protect Adults at Risk
- CQC Regulation 13 – Protection from Abuse
- CQC "Safe" Key Line of Enquiry

Immediate protection decisions will always consider the least restrictive option in line with the Mental Capacity Act 2005**.**

12.2 Advocacy and Support Services

We recognise that some Service Users may struggle to express their wishes, understand processes, or feel confident speaking during safeguarding enquiries.

Primus Plus Healthcare will ensure access to:

Independent Advocacy

Where required under the Care Act 2014, an independent advocate will be arranged if the Service User:

- Has substantial difficulty understanding or participating in safeguarding processes
- Has no appropriate person to support them

Advocates help Service Users:

- Understand what is happening
- Express their views
- Be involved in decisions
- Feel empowered and heard

Accessible Communication

- Easy-read documents
- Visual aids
- Simplified explanations
- Extra time for discussion
- Communication adjustments for autistic individuals

Emotional Support

- Access to counselling services
- Referral to local emotional wellbeing services
- Signposting to specialist trauma support

Support for Families (where appropriate)

- Guidance and reassurance
- Clear communication
- Signposting to family support services

This approach reflects:

- Care Act 2014 – Person-Centred Safeguarding
- Equality Act 2010 – Reasonable Adjustments
- CQC Fundamental Standards – Dignity and Respect

12.3 Mental Health Support

We recognise that adults with existing mental health needs may experience safeguarding incidents differently and may be at increased risk of:

- Anxiety
- Depression
- PTSD
- Self-harm
- Emotional withdrawal
- Crisis relapse

Primus Plus Healthcare will ensure that victims receive appropriate and proportionate mental health support.

Immediate Mental Health Assessment

Where required, we will:

- Contact the Service User's GP
- Liaise with Community Mental Health Teams (CMHT)
- Contact crisis teams if urgent support is needed

Access to Therapy and Specialist Support

This may include:

- Talking therapies (e.g., CBT)
- Trauma-informed therapy
- Referral to NHS psychological services
- Support from mental health practitioners

Social Worker Involvement

If the Service User is open to social care, we will:

- Liaise with their allocated social worker
- Request reassessment of needs where appropriate
- Ensure safeguarding plans align with care planning

Crisis Support

If a Service User experiences deterioration in mental health following abuse:

- 999 will be contacted in emergencies
- NHS 111 (Mental Health Option) may be contacted
- Local crisis teams will be engaged

Ongoing Monitoring

Following a safeguarding incident, we will:

- Review risk assessments
- Update support plans
- Provide additional staff reassurance
- Monitor wellbeing more frequently

This approach aligns with:

- Care Act 2014 – Promoting Wellbeing
- Health and Social Care Act 2008 – Regulation 12 (Safe Care and Treatment)
- CQC Fundamental Standards – Safe & Responsive
- Mental Health Act 1983 (where applicable)

12.4 Trauma-Informed and Autism-Aware Support

Primus Plus Healthcare recognises that adults with autism or learning disabilities may:

- Process trauma differently
- Experience sensory overload
- Have difficulty expressing distress
- Mask emotional impact

We therefore ensure:

- Quiet and safe spaces for discussion
- Predictable communication
- Avoidance of overwhelming questioning
- Clear explanations of next steps
- Adjustments based on sensory needs

Staff are trained in safeguarding, autism awareness, and learning disability-informed practice in line with CQC expectations.

12.5 Recovery, Empowerment and Moving Forward

Safeguarding does not end when an investigation closes.

We support Service Users to:

- Rebuild confidence
- Maintain independence in supported living
- Re-establish trust
- Continue pursuing personal goals

We will always ask:

- What does the Service User want to happen?
- What outcome feels safest and most supportive for them?

This reflects the Making Safeguarding Personal (MSP) approach required under the Care Act 2014**.**

13.0 RESTRAINT PROCEDURES

At Primus Plus Healthcare, we recognise that the use of restraint is a serious intervention that can impact a person's dignity, rights, emotional wellbeing, and trust. As a supported living provider without personal care, our model is built around independence, choice, and empowerment.

Restraint is not part of routine practice and will only ever be considered in exceptional circumstances where there is an immediate risk of harm.

The use of restraint is governed strictly by:

- Mental Capacity Act 2005
- Care Act 2014

- Health and Social Care Act 2008 (Regulation 12 – Safe Care and Treatment)
- Regulation 13 – Protection from Abuse
- Human Rights Act 1998

Restraint must always be:

- Lawful
- Necessary
- Proportionate
- The least restrictive option
- In the person's best interests (where capacity is lacking)

13.1 Types of Restraint

Restraint is defined under Section 6 of the Mental Capacity Act 2005 as the use of force, or the threat of force, to make someone do something they are resisting, or restricting a person's freedom of movement.

The following types of restraint are recognised:

13.1.1 Physical Restraint

Physical restraint involves direct physical contact to restrict movement.

Examples may include:

- Holding a person's arms to prevent self-injury
- Blocking a doorway to prevent immediate danger
- Guiding someone away from a dangerous situation

In supported living, physical restraint would only ever be considered where:

- There is immediate risk of serious harm
- De-escalation techniques have failed
- No less restrictive alternative exists

Physical restraint must never:

- Cause pain
- Restrict breathing
- Involve excessive force
- Be used as punishment

13.1.2 Mechanical Restraint

Mechanical restraint involves the use of equipment or devices to restrict movement.

Examples may include:

- Straps
- Belts
- Lap belts on wheelchairs (if used restrictively)

Primus Plus Healthcare does not use mechanical restraint as part of routine practice. Any restrictive equipment must:

- Be clinically justified
- Form part of an agreed care plan
- Be risk assessed
- Be proportionate

Mechanical restraint used purely for staff convenience is strictly prohibited.

13.1.3 Pharmacological Restraint

Pharmacological restraint refers to the use of medication to control behaviour rather than to treat a diagnosed medical condition.

Examples include:

- Sedatives used to manage agitation
- PRN medication used solely to control behaviour

Medication must:

- Be prescribed appropriately
- Have clear clinical justification
- Be regularly reviewed
- Never be used as punishment or behavioural control

In supported living without personal care, medication administration is typically managed by healthcare professionals or self-managed by Service Users. However, staff must remain vigilant to inappropriate use.

13.2 When Restraint May Be Used

Restraint may only be used:

- In emergency situations
- Where there is an immediate risk of harm to the Service User or others
- When all other de-escalation strategies have failed
- When it is proportionate to the level of risk

In accordance with the Mental Capacity Act 2005, restraint is lawful only if:

1. The person lacks capacity in relation to the specific decision
2. The restraint is necessary to prevent harm
3. The intervention is proportionate to the likelihood and seriousness of harm

Restraint must never be used:

- For convenience
- As punishment
- As a behavioural management shortcut
- To enforce compliance

13.2.1 Positive and Preventative Approaches

Before restraint is ever considered, staff must use:

- Verbal de-escalation
- Active listening
- Sensory adjustments
- Removing triggers
- Offering space and time
- Alternative choices
- Positive Behaviour Support (PBS) strategies

Primus Plus Healthcare prioritises prevention over restriction.

13.2.2 Documentation and Reporting

Any use of restraint must be:

- Immediately reported to the Registered Manager
- Documented clearly and factually
- Recorded as an incident
- Reviewed promptly
- Risk assessed to prevent recurrence

If restraint results in injury or meets safeguarding thresholds, it will be reported under:

- Regulation 13 – Safeguarding
- Care Act 2014 Section 42 (if applicable)

13.3 Prohibited Restraint

The following forms of restraint are strictly prohibited under all circumstances:

- Any restraint restricting breathing
- Prone (face-down) restraint
- Neck holds
- Seclusion or isolation as punishment
- Excessive force
- Humiliating or degrading restraint
- Mechanical restraint without clinical justification
- Sedation without prescription

Any use of unlawful restraint may constitute:

- Abuse under the Care Act 2014
- A breach of Regulation 13
- A violation of Human Rights (Article 3 – Freedom from Inhuman or Degrading Treatment)

Staff found to engage in prohibited restraint will face:

- Immediate investigation
- Suspension
- Referral to DBS
- Potential police involvement

13.4 Training on Restraint

Primus Plus Healthcare ensures that all staff receive training in:

- Mental Capacity Act 2005
- De-escalation techniques
- Positive Behaviour Support
- Recognising triggers and distress
- Trauma-informed care
- Autism-aware practice

Where roles require it, staff may receive specialist training in safe physical intervention, which focuses on:

- Minimising harm
- Avoiding pain compliance
- Protecting dignity
- Using the least restrictive approach
- Recognising early warning signs

Training is refreshed regularly and recorded as part of workforce compliance.

13.5 Deprivation of Liberty

Where restrictions become continuous or significant, they may amount to a Deprivation of Liberty**.**

Primus Plus Healthcare will:

- Identify potential deprivation risks
- Refer appropriately for authorisation where required
- Work in line with the Mental Capacity Act 2005
- Seek legal advice where necessary

Supported living settings are subject to Court of Protection authorisation where deprivation occurs.

13.6 Monitoring and Review

Following any restraint incident:

- A full debrief will occur
- The Service User will be offered emotional support
- Staff involved will be reviewed

- Risk assessments will be updated
- Behaviour support plans revised
- Learning will be shared appropriately

The goal is always to prevent recurrence.

14.0 MULTI-AGENCY COLLABORATION

At Primus Plus Healthcare, we understand that safeguarding is a shared responsibility and that collaborating with external agencies is essential to ensuring that Service Users are protected from abuse, neglect, and exploitation. Effective safeguarding cannot be achieved in isolation; it requires an integrated, multi-agency approach, where information is shared, expertise is utilized, and all parties work together in the best interests of the Service User.

As part of our commitment to safeguarding, Primus Plus Healthcare will engage with the following external bodies and stakeholders to ensure that safeguarding practices are coordinated, effective, and comprehensive.

14.1 Local Safeguarding Adults Boards (LSABs)

Local Safeguarding Adults Boards (LSABs) play a critical role in ensuring that local agencies collaborate effectively in safeguarding adults at risk. Primus Plus Healthcare will actively engage with LSABs in our local area to ensure that safeguarding practices align with national and local standards and that we are continuously improving our safeguarding efforts.

Key Responsibilities of LSABs:

- Multi-Agency Collaboration: LSABs bring together representatives from different sectors, including health, social care, police, and voluntary organizations, to share information, coordinate actions, and ensure that safeguarding practices are consistent across services.
- Safeguarding Reviews and Learning: LSABs are responsible for conducting Safeguarding Adults Reviews (SARs) when a Service User dies or experiences serious harm following abuse or neglect. These reviews identify lessons that can improve future practice.
- Setting Local Safeguarding Policies: LSABs help develop local safeguarding policies and procedures, ensuring that all local care providers are working to the same standards and that safeguarding concerns are addressed promptly.

How Primus Plus Healthcare Will Engage:

- Attend LSAB Meetings: Primus Plus Healthcare will participate in LSAB meetings, contributing to discussions on safeguarding improvements and sharing knowledge about local safeguarding practices.
- Implement Best Practices: We will adopt and implement best practices and recommendations from the LSAB to enhance our safeguarding protocols and procedures.
- Share Safeguarding Information: When appropriate, Primus Plus Healthcare will share relevant safeguarding information with the LSAB to ensure that collective action is taken to protect vulnerable adults.

Relevant Regulations:

- Care Act 2014, Section 42 (Duty of Local Authorities to make inquiries)
- CQC Fundamental Standards
- Health and Social Care Act 2008 (Regulated Activities) Regulations 2014, Regulation 13 (Safeguarding Service Users from Abuse and Improper Treatment)

14.2 Collaboration with the NHS

Primus Plus Healthcare acknowledges the importance of collaborating with NHS bodies to ensure that safeguarding protocols are effectively integrated with health care services. Many Service Users will have complex health needs, and safeguarding must be closely linked with health care provision to ensure comprehensive care and support.

Key Responsibilities of the NHS:

- Health and Safety Support: NHS services are often involved in responding to physical injuries or health issues arising from abuse or neglect. They also play a key role in identifying health-related signs of abuse, such as malnutrition, untreated injuries, or neglect.
- Mental Health Support: Mental health professionals within the NHS may work with individuals who have experienced trauma due to abuse. Primus Plus Healthcare will ensure access to these services when needed.
- Coordinating Care: Effective safeguarding requires that health care and social care services work together to provide coordinated care plans that reflect both the Service User's medical and social needs.

How Primus Plus Healthcare Will Collaborate:

- Regular Communication: We will maintain regular communication with local NHS Trusts and healthcare providers to ensure that Service Users' health needs are met in a timely manner and that any safeguarding concerns related to health are addressed promptly.
- Shared Care Plans: In cases where Service Users require ongoing health care support, we will collaborate with the NHS to develop person-centered care plans that consider both health and safeguarding needs.
- Information Sharing: With appropriate consent or under statutory guidance, we will share safeguarding concerns with NHS professionals to ensure that health and safety risks are addressed as part of the care process.
- Referral to NHS Services: If a Service User requires specific health care services, such as therapy, psychological support, or medical assessments, Primus Plus Healthcare will make the appropriate referrals to NHS services.

Relevant Regulations:

- Care Act 2014, Section 42 (Safeguarding Enquiries)
- Health and Social Care Act 2008 (Regulated Activities) Regulations 2014, Regulation 13 (Safeguarding Service Users from Abuse and Improper Treatment)
- CQC Fundamental Standards (Safe, Caring)

14.3 Engagement with Families and Advocates

At Primus Plus Healthcare, we understand the vital role that families and independent advocates play in supporting Service Users and ensuring that safeguarding concerns are raised

and addressed. Engagement with families and advocates is a cornerstone of person-centered care, and it helps to ensure that Service Users' voices are heard and their wishes are respected.

Key Responsibilities of Families and Advocates:

- Supporting the Service User: Families and advocates provide emotional support and ensure that the Service User's needs and wishes are communicated clearly during safeguarding processes.
- Ensuring Involvement: They help ensure that Service Users are involved in decision-making and that any safeguarding interventions are in the Service User's best interests.
- Providing Legal or Emotional Support: Independent advocates can offer additional support during safeguarding investigations, particularly when Service Users may have difficulty expressing themselves or understanding the process.

How Primus Plus Healthcare Will Engage:

- Encourage Family Involvement: We will work in close collaboration with families, ensuring that they are involved in care planning, safeguarding reviews, and any decisions made about their loved one's care and safety.
- Provide Independent Advocacy

15.0 MONITORING AND REVIEW

At Primus Plus Healthcare, we recognize that safeguarding is an ongoing responsibility. Safeguarding procedures must adapt and evolve to meet new challenges, reflect changes in legislation, and ensure the continued safety and well-being of Service Users. This section outlines how we will monitor, review, and improve our safeguarding policies and procedures to ensure they remain robust, responsive, and effective.

15.1 Annual Reviews

Primus Plus Healthcare is committed to conducting annual reviews of the safeguarding policy to ensure that it is up to date, compliant with the latest legislative changes, and reflects best practice.

These reviews will:

- Evaluate Effectiveness: Assess the effectiveness of safeguarding procedures in protecting Service Users from abuse, neglect, and exploitation.
- Identify Gaps: Identify any gaps in the policy or areas where improvements are needed, particularly in response to new risks, challenges, or feedback from Service Users, staff, or external agencies.
- Adapt to Legislative Changes: Ensure that the policy remains compliant with relevant CQC regulations, the Care Act 2014, and other safeguarding legislation. Any changes in national guidelines, local safeguarding frameworks, or best practices will be incorporated into the policy.
- Align with CQC Key Lines of Enquiry (KLOEs): The annual review will include a check against CQC KLOEs for safeguarding, ensuring that the policy aligns with CQC’s expectations for safe, effective, and well-led services.

Relevant Regulations:

- Health and Social Care Act 2008 (Regulated Activities) Regulations 2014, Regulation 13 (Safeguarding Service Users from Abuse and Improper Treatment)
- Care Act 2014, Section 42
- CQC Fundamental Standards
- CQC Key Lines of Enquiry (KLOEs)

15.2 Auditing

Primus Plus Healthcare will conduct regular audits of safeguarding procedures to assess their implementation, effectiveness, and compliance with the organization's safeguarding policy. These audits will:

- Assess Compliance: Ensure that safeguarding procedures are being followed consistently by all staff, volunteers, and contractors. This will include reviewing documentation, incident reports, and case files.
- Identify Areas for Improvement: Highlight areas where safeguarding practices can be improved, including identifying any barriers to effective safeguarding or any missed opportunities for intervention.
- Ensure Staff Accountability: Audit the training and performance of staff involved in safeguarding to ensure that they have the knowledge and skills needed to identify, report, and respond to safeguarding concerns.
- Evaluate Incident Outcomes: Review the outcomes of safeguarding concerns and incidents, identifying patterns or trends that may require changes to policy or practice.

Audits will be conducted quarterly and annually, depending on the severity and volume of safeguarding concerns, with findings reported to senior management and used to inform ongoing improvement.

Relevant Regulations:

- Health and Social Care Act 2008 (Regulated Activities) Regulations 2014, Regulation 13 (Safeguarding Service Users from Abuse and Improper Treatment)
- CQC Fundamental Standards
- Care Act 2014, Section 42
- CQC Key Lines of Enquiry (KLOEs)

15.3 Feedback Mechanisms

To continuously improve safeguarding practices, Primus Plus Healthcare will establish clear feedback mechanisms to gather input from Service Users, staff, and external stakeholders. This feedback will be used to assess the effectiveness of the safeguarding policy and to refine and improve procedures. The following methods will be employed:

- Service User Feedback:

  We will regularly gather feedback from Service Users regarding their experiences of care and their views on safety, dignity, and respect. This may include:

  - Surveys: Anonymous surveys or questionnaires focused on safeguarding and their sense of safety.

- One-on-one discussions: Service Users will be encouraged to share their experiences in confidential settings, including independent advocates or key workers.
- Regular reviews: Through care reviews, Service Users will have the opportunity to voice any concerns about their care or safety.

- Staff Feedback:

  We will regularly seek feedback from staff regarding the safeguarding procedures they follow, including:

  - Staff surveys and meetings: Regularly scheduled staff surveys and feedback sessions will allow staff to share their thoughts on safeguarding procedures and any challenges they face in maintaining a safe environment for Service Users.
  - Supervision and appraisals: Staff will have regular supervision sessions where safeguarding practices can be discussed, including any concerns, challenges, or suggestions for improvement.
  - Whistleblowing: Staff will be encouraged to use the whistleblowing policy to raise any concerns they have regarding safeguarding practices or breaches, ensuring that their voices are heard and acted upon.

- External Stakeholder Feedback:

  We will collaborate with external partners, including Local Authority Safeguarding Adults Teams, CQC, and other agencies, to gather feedback on the effectiveness of our safeguarding practices. This may include:

  - Regular meetings with safeguarding boards and local authorities to ensure we are meeting the requirements set out by Local Safeguarding Adults Boards (LSABs).
  - Partner feedback: Gathering insights from healthcare providers, external advocacy services, and other relevant stakeholders involved in safeguarding processes.

The feedback gathered will be analysed, and action plans will be created based on the findings to ensure that the safeguarding policies are continuously updated to meet the needs of Service Users and the standards required by regulators.

Relevant Regulations:

- Health and Social Care Act 2008 (Regulated Activities) Regulations 2014, Regulation 13 (Safeguarding Service Users from Abuse and Improper Treatment)
- CQC Fundamental Standards (Safe, Caring, Effective, Well-Led)
- Care Act 2014, Section 42
- CQC Key Lines of Enquiry (KLOEs)

1. SAFEGUARDING REFERRAL FORM

Primus Plus Healthcare

Safeguarding Referral Form

Date of Referral: _____

Name of Referrer: _____

Position/Role: _____

Contact Details: _____

Service User Name: _____

Service User Date of Birth: _____

Service User Address: _____

Service User Phone Number: _____

Details of the Concern

- Type of Abuse (please circle):
  - Physical Abuse
  - Emotional/Psychological Abuse
  - Sexual Abuse
  - Financial Abuse
  - Neglect
  - Discriminatory Abuse
  - Modern Slavery
  - Other (please specify): _____
- Date/Time of Alleged Incident: _____
- Details of Alleged Incident (Please provide a detailed description):

_____

_____

_____

- Immediate Actions Taken (e.g., reporting, risk mitigation, medical care):

_____

_____

_____

- Has the Service User expressed their wishes? (if applicable):

_____

_____

Risk Assessment

- Is the Service User in immediate danger? (Yes/No):

- Action Required (e.g., emergency services, referral to external agency):

Contact Details of Relevant External Agencies Involved (if any):

- Police: _____
- Local Authority Safeguarding Team: _____
- CQC: _____

Referrer Signature: _____

Date: _____

2. SAFEGUARDING INCIDENT REPORT FORM

Primus Plus Healthcare

Safeguarding Incident Report Form

Incident Report Number: _____

Date of Incident: _____

Time of Incident: _____

Staff Involved: _____

Service User(s) Involved: _____

Details of the Incident:

- Type of Abuse: (circle one)

  Physical, Sexual, Emotional, Financial, Neglect, Discriminatory, Other (please specify): _____
- Location of Incident: _____
- Description of Incident:

- Immediate Actions Taken:

Follow-up Actions:

- Were any immediate safeguarding measures taken?

  (e.g., removal of alleged perpetrator, medical assistance, etc.)

- Who was notified of the incident?

  (Police, local authority, family, etc.)

- Details of Any Referral Made:

Incident Report Completed By: _____

Signature: _____

Date: _____

3. RISK ASSESSMENT FORM

Primus Plus Healthcare

Risk Assessment Form

Date of Assessment: _____

Name of Assessor: _____

Position/Role: _____

Service User Details:

- Name: _____
- Date of Birth: _____
- Address: _____
- Phone Number: _____

Assessment Details:

- Risk Identified (check all that apply):
  - Abuse
  - Neglect
  - Self-Neglect
  - Mental Health Crisis
  - Financial Exploitation
  - Lack of Support
  - Medication Issues
  - Environmental Hazards
  - Other: _____
- Severity of Risk (circle one):
  High | Medium | Low
- Likelihood of Risk (circle one):
  High | Medium | Low

Actions to Mitigate Risk:

- Immediate Actions to Take**:**

- Follow-Up Actions to Take:

- Responsible Person for Follow-Up: _____
- Date for Follow-Up: _____

4. STAFF TRAINING RECORD FORM

Primus Plus Healthcare

Staff Safeguarding Training Record Form

Staff Member Name: _____

Position/Role: _____

Date of Training: _____

Trainer's Name: _____

Training Session Topic: _____

Training Content Covered**:**

- Types of Abuse: (check all that apply)
  - Physical Abuse
  - Emotional Abuse
  - Financial Abuse
  - Sexual Abuse
  - Neglect
  - Other (please specify): _____
- Safeguarding Procedures
- Mental Capacity Act 2005
- De-escalation Techniques
- Whistleblowing Policy
- Recognising Signs of Abuse
- CQC Safeguarding Expectations
- Reporting Concerns

Training Outcome:

- Staff Member's Understanding: (circle one)

  Fully Understand | Partially Understand | Needs Further Training

Signature of Staff Member: _____

Signature of Trainer: _____

5. SAFEGUARDING CONCERN REPORT FORM

Primus Plus Healthcare

Safeguarding Concern Report Form

Date of Report: _____

Concern Reported By: _____

Position: _____

Contact Details: _____

Details of the Concern:

- Service User Name: _____
- Date of Incident: _____
- Time of Incident: _____
- Type of Concern (circle one):
  Abuse, Neglect, Self-Neglect, Medication Issue, Financial Exploitation, Other: _____

Action Taken:

- Immediate Response (if any):

- Person(s) Involved in Handling the Concern:

Escalation Steps:

- Concern Escalated To: (Circle all that apply)
  Local Authority, CQC, Police, Family, Other: _____

Signature of Reporter: _____

Date: _____

6. WHISTLEBLOWING REPORT FORM

Primus Plus Healthcare

Whistleblowing Report Form

Date of Report: _____

Name of Whistleblower: _____

Position: _____

Contact Details: _____

Details of the Concern:

- Nature of the Concern:

- Has this concern been raised before? (Yes/No): _____
- Action Taken to Date (if applicable):

Outcome Sought:

- What action or investigation would you like to see happen?

Whistleblower Signature: _____
Date: _____

7. Safeguarding Investigation Report Form

Primus Plus Healthcare

Safeguarding Investigation Report Form

Investigation Start Date: _____

Investigation Conducted By: _____

Position: _____

Allegation Details:

- Service User Name: _____
- Staff Involved: _____
- Type of Abuse Alleged: (circle one)
  Physical, Emotional, Sexual, Financial, Neglect, Other

Investigation Findings:

- Summary of Findings:

- Conclusions:

Outcome of Investigation:

- Was the allegation substantiated? (Yes/No): _____
- Action Taken:

Investigator Signature: _____

Date: _____

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